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# Final Environmental Impact Statement

## For the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region

### Comment Letters and Responses

#### Volume III



**"Recovery Through Management"**

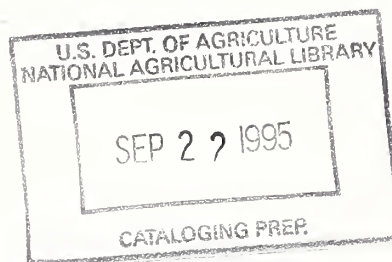
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#### COMMENT LETTERS AND RESPONSES

This volume contains complete copies of comment letters received on the Draft EIS, and Forest Service responses to them. There were 212 comment letters received within the comment period that ended on March 25, 1994. Each of these is reproduced here along with a Forest Service response.

In some cases, where a comment is similar to an earlier one, the response merely refers the reader to that earlier response. Some comments were received from several sources but having identical content. In these cases the comment letter appears only once and is responded to only once as well.

In many cases comments prompted changes to be made between the draft and final EIS. Some led us to modify the preferred alternative. Others led us to other alternatives. Some comments led to editorial improvements in the documents.

Several commentators included, as part of their comment letter, one or more lengthy attachments. In these cases we have omitted the attachments and listed what had been attached. These attachments are included with the original letters in the analysis file for the RCW EIS and are available.

On the following page is an alphabetical listing of all comment letters received.

LIST OF COMMENTS RECEIVED

GOVERNMENT

<u>Letter Number</u>	<u>Agency</u>
29	City of Austin
28	Dept. of Education Smith Cty.
161	Dept of Environment, Parks & Recreation
24	Oklahoma Dept. of Wildlife Conservation
167	Jasper Cty Board of Supervisors
117	LA Dept. of Agriculture and Forestry
89	Perry County Board of Supervisors
90	Perry County Board of Supervisors
166	Perry County Schools
192	SC Wildlife & Marine Resources Dept.
188	Scott County Board of Supervisors
185	Smith County Board of Supervisors
198	Texas Parks & Wildlife Dept.
169	U.S. Department of the Interior
78	Union Public School District
66	Wayne County Board of Supervisors
179	Western Line School District

# ORGANIZATIONS AND BUSINESSES

<u>Letter Number</u>	<u>Name</u>
100	Alabama Woodpecker League
200	Alabama Audubon Council
113	Almond Bros. Lumber & Supply, Inc.
162	Arkansas Forestry Association
204	Atlanta Audubon Society
20	Attorney at Law
150	Audubon Council of Texas
187	Bienville Quail Association
42	Carter Wood, Inc.
157	Columbus Lumber
122	Consulting Foresters, Ltd.
37	Conway Pole & Piling, Co., Inc.
58	Dixieland Forest Products
56	Donald S. Bell and Associates, A.C.F.
130	Dulaney Law Firm
23	Energy-Wood Management
2	Feldman Lumber Co, Inc
189	FL Chapter - The Wildlife Society
111	Florida Forestry Association
41	Franklin Timber Company
69	G&G Forestry Associates, Inc.
47	Georgia-Pacific Corp.
48	Georgia-Pacific Corp.
49	Georgia-Pacific Corp.
50	Georgia-Pacific Corp.
51	Georgia-Pacific Corp.
52	Georgia-Pacific Corp.
186	Georgia-Pacific Corp.
146	Georgia-Pacific Corporation
4	Gibbs and Sons Electric, Inc.
38	Gulf Lumber Company, Inc.
76	Hancock Lumber & Forest Products
94	Hankins Lumber Company, Inc.
67	Helena Chemical Company
155	Hood Industries, Inc.
59	International Paper
124	International Paper
127	International Paper
123	Joint Medical Products Corp.
116	Kentucky Forest Industries Association
72	Komp Equipment Co, Inc.
73	Komp Equipment Co, Inc.
178	L.C. White Forest Consultant Services
181	Lamb's Realty & Forestry
87	Lape Industrial
197	Louisiana Forestry Association
115	Louisiana Pine Straw Assoc.

# ORGANIZATIONS AND BUSINESSES

<u>Letter</u> <u>Number</u>	<u>Name</u>
27	Mississippi Federal Timber Council
147	Mississippi Federal Timber Council
102	Mississippi Forestry Commission
207	Moore-Alsworth Forest Consultants, Inc.
183	Mountain City Lumber Company
203	National Wild Turkey Federation, Inc.
83	Nat'l Council of the Paper Industry for Air and Stream Imp., Inc.
109	Oktibbeha Audubon Society
194	Orleans Audubon Society
193	Ouachita N.F. Timber Purchasers Group
98	Progress Wood
97	Provine Helicopter Service, Inc.
154	Robinson Farms, Inc.
105	Rollins Pulpwood and Timber Co.
110	Sierra Club
165	Sierra Club
26	Sierra Club - Lone Star Chapter
60	Soule Steam Feed Works
143	Southeastern Lumber Manu. Assoc., Inc.
212	Southern Environmental Law Center
108	Southern Land Management, Inc.
43	Southern Lumber Company, Inc.
86	Southern Resource Service, Inc.
201	Southern Timber Purchasers Council
132	Stuart Brothers, Inc.
55	T.F. Evans Lumber Co, Inc.
68	Tall Timbers
160	Tall Timbers
19	Texas Committee on Natural Resources
74	TimberCorp
134	Timberland Management Services, Inc.
173	Trail Riders of Houston
112	Weyerhaeuser
32	Wildlife Wood Carving
139	Wilkerson & Crawford, Attorneys at Law

# INDIVIDUALS

Letter			Letter		
Individuals Commenting			Individuals Commenting		
<u>Number</u>	<u>Last Name</u>	<u>First Name</u>	<u>Number</u>	<u>Last Name</u>	<u>First Name</u>
5	ADAMS	MARY L.	138	CRAWFORD	BILL
113	ALMOND	ARDIS	139	CRAWFORD	DAVID S.
153	ALT	BRUCE	141	CRAWFORD	LOUIS
89	ANDERSON	JOHN W.	282	CREWS	TOM
66	ANDREWS	FRED	109	CROFT	W. LAWRENCE
120	ARLEDGE	JIM	126	DANIELS	BOB
6	AUDDLITS	MICHAEL R.	135	DARDEN, JR.	HENRY W.
64	BAILEY	JAMES A.	134	DAUGHDRILL	MIKE
201	BAKER	DEBORAH B.	170	DENNEY	BRINK
191	BAKER	W. WILSON	49	DOUGLAS	BARRY
171	BARNETT	GERALD	196	DUCKWORTH	JOE D.
162	BARNEYCASTLE	CHRIS	24	DUFFY	GREG
133	BARTON	RISA	130	DULANEY	WILL
142	BARTON, JR.	BILLY R.	183	EDWARDS	DOUG
206	BATES	VERNON	112	EMERSON	STEVE
27	BEHAN	JOHN	160	ENGSTROM	R. TODD
147	BEHAN	JOHN	163	FAWN	KENN
157	BEHAN	JOHN	2	FELDMAN	DAVID
56	BELL	DONALD S.	210	FREENY	JIMMIE & RUTH
193	BIBLER	JAMES	195	FREIBERG	JORG
63	BLACKBURN	JOHN	117	FREY	PAUL
1	BOOHER	SAM	19	FRITZ	EDWARD C.
25	BOOHER	SAM	155	GALLOWAY	JOHN
121	BOOKER	KEN	4	GIBBS	JERRY A.
48	BOYD	VIRGINIA	39	GOFORTH	RICKY
28	BOYLES,	C.M.	99	GOODMAN	MARK A.
127	BRADLEY	JOHN	111	GORNICKI	PHILIP P.
175	BREAUX	STEPHEN	69	GRAHAM	CHARLES W.
137	BRELAND	ERLINE L.	176	GRANTHAM	VANCE
136	BRELAND	L. M.	179	GREEN	LARRY
205	BROOKS	AL	101	GREEN	WILLIAM
88	BROUGHTON	JIMMY	32	HALL	TIM
165	BROUSSARD	RONNEY L.	211	HALLMAN	WILSON
50	BROWN	CLYDE	29	HAMILTON	JODY R.
45	BUFKIN	HOMER	76	HANCOCK	TIMOTHY
74	BUTLER	STEPHEN M.	94	HANKINS	A. BURTON
35	BYRD	B. A. W.	79	HANNAFORD	WILLIAM
156	CALDWELL	JOHN	115	HEINTZ	HARVEY
145	CANTELE	JOHN	34	HELMS	JOHN R.
82	CAREY	EVELYN	57	HENDERSON	LAVELLE
41	CARTER	EDGAR L.	13	HERBERT	ALLEN J.
42	CARTER	EDGAR L.	168	HERMANN, PH.D.	SHARON M.
212	CARTER, JR.	DERB S.	44	HINSON	MARTA F.
8	COFFEY	JAMES	70	HOOD	WARREN A.
102	COLVIN	BILL	54	HOOP, JR.	LOUIE B.
192	CONRAD, JR.	W. BROCK	47	HUDSON	CLIFF
37	CONWAY	KENNETH	12	HUFF	OVA J.
190	COOK	DAVID G.	20	HUNT	TANN H.
149	COPELAND	MARGARET S.	114	HUTCHENS	JAMES
219	CRAIG	JERRY	80	JACKSON	DAVEY
234	CRAIG	R. EUGENE	199	JAMES	FRANCES C.

Letter Number			Letter Number		
Individuals Commenting			Individuals Commenting		
	<u>Last Name</u>	<u>First Name</u>		<u>Last Name</u>	<u>First Name</u>
122	JOHNSON	C. D.	148	PEARL	ROBERT W.
85	JOHNSON	CYRUS	202	PETERSON	PETE M.C.
61	JONES, JR.	JAMES H.	84	PORTWOOD	C. JEFFREY
53	KEADY	JEFF	166	POWELL	JOEL
9	KEELEY	ED	86	PRINE	E. LYNN
46	KELLY	RICKEY	98	Progress Wood	
203	KENAMER	JAMES EARL	97	PROVINE	CINDY
73	KOMP	GEORGE B.	200	REID, JR.	ROBERT R.
72	KOMP	GEORGE P.	119	REITAN	LEO A.
104	KUTACK	JASON	146	RICHARDSON	WARREN
16	LACOUR	SMS HENRY J.	185	ROBINSON	DENNIS
181	LAMB	DANNY	129	ROBINSON	JIM
65	LANG	DAVID	154	ROBINSON	JOE
11	LANSKA, M.	DOUGLAS J.	30	ROEBBER	DIXIE
87	LAPE	JIM	172	ROGERS	TOMMIE L.
169	LAUMEYER	PHILIP	105	ROLLINS	JOE
194	LEBLANC, III	FRANK	167	RUFFIN	WILLIAM R.
116	LEE	JAMES	208	RURECHEA	JOHN
161	LEGRAND, JR.	HARRY E.	14	RUSHING	RICK
182	LEIDEN	THOMAS M.	173	RYAN	TED E.
52	LITTLE	DEWANA	77	SANDY	M. L.
26	MADDUX	TOM	10	SCHNEIDER	MARY JO
110	MADDUX	TOM	164	SCHRIEVER	WILLIAM
144	MANNCHEN	BRANDT	150	SCHULTZ	JANE
3	MARSILI	L.A.	103	SMISTIK	ROBERT
36	MCBRIDE	CANDICE	118	SMITH	ADA ASHLEY
217	MCCANTS	ARTHUR W.	140	SMITH	CAROL
143	MCCLENDON	BRENT	187	SNELL	WARNER
251	MCCOLD	LANCE	125	SOJOURNER	CARROLL
23	MCCONNELL	W.V.	60	SOULE	G. ROBERT
81	MCINNIS	WILLIAM	151	SPINKS	JOE
198	MCKINNEY	LARRY D.	38	STIMPSON	FRED T.
152	MCLENDON	FRANK	128	STOCKER	LISA B.
59	MEADE	TIMOTHY	68	STOCKETT, CLU	MARVIN E.
21	METIVIER	JOHN	132	STUART	MARLIN & MARION
7	MIGE	FLOYD	107	SUN	MITCHELL
93	MILLER	CARL	214	TADLOCK	BILLY
92	MILLER	ELIZABETH	177	TADLOCK	PAUL
71	MILLER	FRANK	18	TAYLOR	GEORGE P.
184	MILLER	TOMMY C.	15	TAYLOR	TIM AND PEG
189	MILLSAP	BRIAN A.	33	TAYLOR, JR.	ROBERT M.
131	MOORE	R. L.	22	THOMPSON	MICHAEL E.
207	MOORE, ACF	JOHN O.	158	TISSUE, JR.	OSCAR C.
124	MORGAN	CHARLIE	159	TSCHINKEL	WALTER R.
180	MORGAN	JOHN	186	TUCKER	WAYNE
106	MORRIS	KENT	43	TURNAGE	ROLLIN
75	MOSS	ROBERT S.	62	VAN DEVENDER	CLINTON
91	MYERS	TONY	108	VAN HENDRY	DAVID
31	NUCKOLS	MARY D.	197	VANDERSTEEN	C.A. BUCK
204	OBERLE	MARK	100	VAUGHAN	RAY
209	PALMER	MARK A.	17	VERRET	ROBERT



<u>Letter Number</u>	<u>Last Name</u>	<u>First Name</u>
78	WADE	WILLIAM
96	WAGGONER	SAM
188	WAGGONER	TOM ED
67	WALL	GREG J.
95	WALLEY	CHARLES
90	WALLEY	PAUL DAVID
55	WEST	MICKEY
178	WHITE	L.C.
123	WHITE	MARTIN
174	WHITE	RICHARD
83	WIGLEY	T. BENTLY
58	WILLIAMS	PHILLIP
51	WISEMAN	MIKE
40	YOUNG	HUGH H.



RCW  
① 12/20/93

Sam Booher  
4387 Roswell Rd  
Augusta, Ga 30907  
15 December 1994

Joseph Dabney  
US Forest Service

Dear Mr. Dabney,  
First, thank you for giving me this opportunity to comment on your RCW program.

For fear that my best intentions of a long and detailed response do not get met in this case, please allow me this opportunity to briefly comment. I wish to again comment in more detail after the holidays.

Sam Booher  
(206) 863-2324

1. I feel the Forest Service policy to always burns from November to March needs to be re-evaluated. While this is easiest for the Forest Service, it may not be best for native plants and animals. Thus your effort for mis-story control is destroying both Federally Endangered plants and animals by your current control burning schedule.
2. Current use of pesticides and herbicides to produce better timber needs a closer look at what destruction to native plants and wildlife it is causing.
3. Your 3/4 mile circle around RCW is just that an island in a forest. While this MAY be suitable for a home site it is not large enough for food sources nor for an expanding (sustainable) colony. Thus your 3/4 mile circle is itself destroying the RCW.
4. Your policy of 70-80 year rotation of timber is directly on target to remove the pine trees just at a time when they become suitable for the RCW. Pine in the home sites and feeding range for both known Bites, expanding and planned future RCW sites should NEVER be removed. These areas should be "Set-Asides" and a lot larger than 3/4 mile circles. Our small populations are dropping in number and I believe this is the primary reason.
5. Why does the Federal Forest Service REWARD Forest Supervisors (FS) that timber RCW sites and remove all of the RCW from their forests? This what you are doing. It may be unintentional but it is a fact. You evaluate Forest Supervisors based on timber production. This best way to produce timber is get rid of RCW. So -o. I offer that your Supervisor Evaluations should be based on Per Cent of increase in breeding pairs of RCW. Then you would see their number increase as FS have a vested interest other than just doing the right things to do.

Response to Comments in Letter No. 1

From: Mr. Sam Booher

Comment No. Response

1. The majority of the native plants, animal and PETS species which occupy habitat similar to the RCW depend on the same fire-dependent ecosystem as the RCW. Therefore, the use of fire as a management tool to reduce midstory should have little or no impact on these species. Growing season burns (spring-summer) will be used in most cases, however, burning will occur throughout the year when the weather is suitable.
2. Herbicide use may occur in areas where prescribed burning is not able to control the larger trees in midstory reduction. Herbicides will be applied using single stem treatments including single stem injection, hypo-hatchet, cut stump treatment, or dormant season basal bark spray.
3. Delineation of Habitat Management Areas (HMAs) will eliminate the island effect. The idea is to apply a landscape scale approach to RCW recovery.
4. The USDA Forest Service agrees that the 70-80 year rotation of timber is unsuitable for RCW population expansion and recovery. The selected alternative identifies rotations from 70 to 120 years, depending on the pine species.
5. The HMAs were delineated based on the 1986 RCW distribution. The Forest Service is actively involved in RCW management and the direction is evolving along with the knowledge being being obtained on the bird's needs.
6. Population objectives are based on amount of suitable habitat with the HMA, not a historical population level. Proposed population objectives are higher than the population level in 1970 when the RCW was listed as an endangered species.
7. Pine stands are being restored to their native species composition. Many stands have been affected by the lack of fire, which has allowed the growth of non-native species. Fire is one of the management tools that is effective in the reduction or control of midstory vegetation. Prescribed burning is accomplished throughout the year, according to objectives and weather parameters.

Why do you have National Forests that in the 1920's had RCW breeding sites and don't any more. Have you given them the "requirement" to bring them back to the 1920's level? I want nothing less. Why should you except anything less? For a start I request you look at each National Forest and how RCW Colonies each had in 1970. Today's standard should be that number of breeding pairs found in each of our Nation's Forests when the Federal Law was passed in 1970 that said you would protect them.

6. Why are you planting non native plants, why are you burning at wrong time of year and why are you using herbicides in Habitat Management Areas. All of these actions are destroying Native Understory Plants and Wildlife.

7. Wilderness Management. That is an oxymoron to every one but the Federal Forest Service. You do not need to manage the small number of RCW colonies in Wilderness Areas. Yes count them then leave only your "foot prints". No herbicides, thinning, controlled burning, Beetle Control or any other management techniques should be use in Wilderness areas.

You should not hold Forest Supervisors responsible for Beetle control in Wilderness RCW colonies. The few colonies in Wilderness Areas are not essential to species survival. Those in your Federal Forests ARE.

8. Last comment is a Question. Are all known RCW sites and proposed expansion site have Wildlife Management Area protection status? Also, exactly what protection is given an area with Habitat Management Status? Last, Are these two different type areas or do they mean the same thing: Wildlife Management and Habitat Management. If Habitat is better protection for RCW would it not be best to give all of their current and future sites this designation NOW before the trees required for their very survival are harvested?

 Sam Boobey

7. Wilderness RCW groups are considered non-essential for recovery and southern pine beetle control would not be initiated to protect wilderness RCW groups or their foraging habitat. However, southern pine beetle control could be initiated within wilderness to protect RCW groups or their foraging habitat if they are immediately adjacent (within 1/4 mile) to the wilderness boundary. Foraging habitat that occurs in wilderness will not be protected.

8. All known RCW cluster sites are monumented and protected. Within the proposed Habitat Management Areas and outside of the cluster, recruitment stand, and replacement stand boundaries, the area would be managed for a full range of multiple uses. The emphasis would be on sustained production of RCW foraging and future nesting habitat.

# (2) 12/21/93 **FELDMAN LUMBER CO., INC. ROUGH AND DRESSED LUMBER**

228 BUCKEYE ROAD      PHONE 792-4213      Lancaster, Kentucky 40444

December 17, 1993

Joe Dabney, RCW Team Leader  
 U.S.D.A. Forest Service  
 1720 Peachtree Road NW, Suite 718 NW  
 Atlanta, GA 30367

Dear Mr. Dabney:

As sawmill owners doing a great deal of business with the U.S. Forest Service on the Daniel Boone National Forest, we would like to share our input on the Forest Service consideration on the management of 20,000 acres to protect the Red Cockaded Woodpecker.

Since the governments decision to ban logging on several of the Northwest public lands, the price of southern yellow pine has skyrocketed. Government officials can blame in part, Hurricane Hugo, the floods in the midwest, factor in this & factor in that, but to anybody with any common sense, two & two add up to four. What I am politely trying to say is, anyway you cut it supply and demand control prices.

We have always been a large producer of southern yellow pine at our own mills and also, purchased alot from local sawmills. About two years ago when the U.S. Forest Service began to talk about cut backs on the Daniel Boone National Forest, some of the mills we purchased from locally were forced out of business due to the tightening of timber supplies. We then began supplementing our production from mills deeper in the south. After timber supplies were reduced in the northwest, the prices in the deep south began a drastic escalation which forced us to raise our prices, causing us to lose some customer base or to sell the lumber at below cost. Because we are not a government agency, we cannot operate that way. We have a great deal of contractors who's livelihood depends on our ability to supply them southern yellow pine.

Your decision on the 20,000 acres according to the map in the Lexington Herald, runs through a strong yellow pine growth area. It is our opinion that the general public (consumer) is paying as much as they can possibly pay for lumber. A drastic change in the Forest Service management of the Daniel Boone National Forest could be devastating to the price of lumber in the southeast & central Kentucky. You can only pay so much for any product, even if it is badly needed. Please consider the financial impact as well as the environmental impact in your decision.

Sincerely,  
*David Feldman*  
 David Feldman

Roger Cupp  
 David Feldman  
 Feldman Lumber Co., Inc.

RC/DF/kam

Response to Comments in Letter No. 2

From: Feldman Lumber Co., Inc.

Comment No.      Response

1. The proposed action will bring about changes in timber volumes and subsequently timber-related jobs, income and payments to states. While trying to create forest conditions which will be beneficial to the RCW, the strategy is to minimize short-term economic effects and pursue sustainable long-term timber production.

(3)

RCW  
12/21/93

SIR,

MY NAME IS LEE A MARISILI. I READ THE ARTICLE IN THE LEE. HERALD LEADER ABOUT THE RED-COCKADED WOODPECKER. WHILE IT IS NOT A COMMON SIGHT - I HAVE SEEN THESE BIRDS ON SEVERAL OCCASIONS IN THE AREA WHERE I LIVE - LYNCH, KY (HARLAN COUNTY). THESE ARE LARGE AND BEAUTIFUL BIRDS AND SHOULD BE PROTECTED. IF I CAN PROVIDE ANY INFORMATION ON THESE BIRDS - PLEASE LET ME KNOW.

OK dokey!  
JAM

THANK YOU

JAMARIL

L A MARISILI  
Box 34  
LYNCH, KY  
40855

Response to Comments in Letter No. 3

From: L.A. Marisili

Comment No. \_\_\_\_\_ Response \_\_\_\_\_

1. Comment noted.



—

(4) RCW  
12/21/93

~~SPF~~

**GIBBS AND SONS ELECTRIC, INC.**

A Second Generation Company  
5486 Dedman Lane  
Lexington, Kentucky 40513  
(606) 233-3518

Joe Dabney

Dear Sir:

Sitting here reading a front page article about the red-cockaded woodpecker in the Lexington Herald Leader. caused me to realize we own a piece of land in menifee Co. Ky that has a colony of these birds. I love birds and wildlife and am always on the lookout for birds, animals and Natures wonders. So recently while walking over our property I saw one of those up close and observed it for some time as it works on drilling a hole in one of <sup>old</sup> big pines. I knew what it was but didn't know they were this rare. Ps, we ~~would~~ not cut the pines.

Yours  
Map of Area  
on back  
of page  
*Spencer Gibbs*

Response to Comments in Letter No. 4

From: Gibbs and Sons Electric, Inc.

Comment No.

Response

1. Comment noted.

RCW  
12/21/93  
⑤

Please save the  
red-labeled wood -  
Parker by setting  
aside the 20, sec.  
across in Daniel  
Boone National  
Forest. I have  
been out of there  
in my back yard  
Thank you  
Mary L. Adams

Response to Letter No. 5.

From: Mary L. Adams

Comment No.

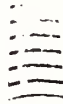
Response

1. Comment noted.

Dear Sirs,  
Thank you for the information on the RCW  
management. My comments:

1. Forget TN/KY and transfer birds elsewhere
2. Burn as many acres as is needed "jointly  
with goal to benefit other wildlife"
3. Put timber production as #1 priority, clearcut  
as much as is needed, bore trees, or grow  
120+ year old stands wherever needed
4. Remember YOU are the experts, be proud  
of the successful cultivation of abused lands  
since 1900, be aware of the sure enough  
mistakes that have been made, and do  
what is the best multi-use sustained  
highest production regardless of what  
weekend suburban earth worshippers say  
to do cause they wipe their rear ends with  
the same paper product natural resource  
professionals do.
5. Simplify, simplify, simplify and prevent unnecessary  
costly staffing and paperwork and  
regulation. Hire good people to ensure a  
good job done.

Michael R. Audditt



Response to Comments in Letter No. 6

From: Michael R. Audditt

Comment No.	Response
1.	We cannot forget about the RCW in Kentucky and Tennessee. We have a legal responsibility to conserve endangered species.
2.	Our proposed burning regimes will benefit other wildlife species.
3.	Our objective within the HWA is to manage the habitat for RCW conservation and recovery. A sustained yield of forest products is part of the strategy, however timber production will not be maximized at the expense of the RCW. Clearcutting is allowed where it plays a role in meeting recovery objectives.
4.	Comment noted.
5.	Comment noted.

—  
Re W  
12/11/93  
SUMMARY  
11/11/93  
12/12/93

(7)

2506 Fernwood Dr.  
Longview, TX 75601  
December 20, 1993

To SBA - Forest Service Southern Region  
RCW/ESL S Team  
1920 Peachtree Road, NW  
Atlanta, GA 30367

Dear Sir:

Please send me a copy of the summary  
guidelines on the Red-cockaded woodpecker.

Thank,  
Floyd Mize

Response to Comments in Letter No. 7

From: Floyd Mize

Comment No.                      Response

1. Request for information was filled on December 27, 1993.

8

RCW

1427/93

12, 18, 93

RCW Team Leader

U.S.D.A. Forest Service

1720 Peachtree Road NW,

Suite 718N

Atlanta, Ga. 30367

Mr. Joe Dabney

I am writing about the issue I read in the

Lexington Herald-Leader about the Red-Cockaded

Woodpecker. This article is informing us about the

mismanagement of the woodpecker. The Forest Service

has considered setting aside 20,000 acres of land

in the David Borne National Forest for this en-

dangered animal.

I feel this is a good idea. If we don't start

protecting our animals and resources we're

not going to have anything left. Maybe if the

land is set aside then the Red-Cockaded

Woodpecker's population could grow stronger

and healthier.

Setting this land aside is not only going to

benefit the woodpecker, but us as well. By

keeping the loggers away from the trees in this

area, the trees could also grow and produce more

lumber.

Response to Comments in Letter No. 8

From: James Coffey

Comment No.

Response

1. Comment noted.

*Received*  
12/2/93

*Ed Keeley*  
12/2/93

⑨

1300 Redford Rd. #1009A  
Houston, Tx. 77034  
Dec. 20, 1993

USDA-Forest Service Southern Region  
RCW/EIS Team  
1720 Peachtree Road, N.W.  
Atlanta, GA 30367

Dear Sir:

Please send me a copy of the complete draft of the Red-cockaded Woodpecker Guidelines. Please also send any EA or EIS which was completed in association with these guidelines. Send them to the address listed above. Thank You.

Sincerely,  
*Ed Keeley*  
Ed Keeley

Response to Comments in Letter No. 9

From: Ed Keeley

Comment No.

Response

1. Request for information filled on December 27, 1993.



12/23/93  
my wife  
& myself

Mr. Dabney,

December 20, 1993

(10)

I am strongly in favor of the Forest Service plans to protect the endangered red-cockaded woodpecker in Kentucky. We have been very good at destroying ecosystems, but not very smart about protecting them.

I believe we can have sustainable development as well as protection of our environment. I realize this plan will create strong debate between the logging community and environmentalists, but there is a way of personal interests are set aside for the long range good of all.

I work in wildlife rehabilitation & education. Everyday, I see the effect of human encroachment upon wildlife and their habitats. The best plan we have for animal endangerment is preservation of critical habitats. When we preserve an area for wild life, we are investing in the healthy future of our own species.

Thank you,

Mary Jo Schneider  
14100 Hickory Hill Trail  
Louisville, Ky. 40299

I would appreciate an outline summary of the draft environmental impact statement

Response to Comments in Letter No. 10

From: Mary Jo Schneider

Comment No.

Response

1. Comment noted.

01

12/2/93

Joe Dabney  
RCW Team Leader  
USDA Forest Service  
1720 Peachtree Road NW, Suite 718N  
Atlanta, Georgia 30367

Dear Mr. Dabney:

I am writing in response to a request for comments on the Forest Service plans to protect the endangered red-cockaded woodpecker, which appeared in the Lexington Herald Leader on December 17, 1993.

I strongly support these plans as outlined in the Herald Leader article. I feel that already the national forests have been ransacked in many ways by the timber industry. I realize that the forests are intended for a variety of uses, but it seems that the emphasis has largely been in favor of the logging industry, rather than preserving a diversity of habitats and species.

Although logging industry spokesmen claim that we need to concern ourselves most with "what the very bottom dollar impact is" (quoted from the Herald Leader article), this is a self-interested, narrow, and short-sighted view. We, as a nation, very much need to preserve important habitats and endangered species for ourselves and our children. Allowing the elimination of older pine forests, or the species that need these forests to survive, would be a travesty of a national treasure.

Sincerely yours,



Douglas J. Lanska, M.D.  
3425 Brandon Dr.  
Lexington, KY 40502

Response to Comments in Letter No. 11

From: Douglas J. Lanska, M.D.

Comment No.

Response

1. Comment noted.

10/17/93

P.O. Box 81

Hazel Green, Ky 41312

USDA Forest Service

1530 Peachtree Rd. NW,

Suite 318N

Atlanta, Ga. 30363

To whom this concerns

Read the article in Lexington Herald-Leader concerning the Red-cockaded Woodpecker's plight

I have access to several acres of Eastern Ky. Pine, mixed and hardwood forest on boundary of Wolfe and Morgan Counties. Also, do a little amateur amateur birdwatching. Will offer the use of this forest for possible nest sites and/or will ask for artificial tree cavity nest or information concerning their construction.

Have't observed many different species yet as just started last winter during deep snow. Sincerely yours.



Ova J. Huff

(12)

rcw

14/2/93

Response to Comments in Letter No. 12

From: Ova J. Huff

Comment No.

Response

1. Comment noted.

12/30/93  
RCW  
13 TELEPHONE 318-255-7474

ALLEN J. HERBERT, M.D. M.P.H.  
FAMILY PRACTICE  
PEDIATRICS

December 21, 1993

Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree rd. NW, Rm. 718N  
Atlanta, GA 30367

Dear Joe,

Thank you for providing me with the Draft Environment  
Impact Statement of the Red-cockaded Woodpecker.

In the summary, it was noted that a large portion of  
the birds remain in privately owned lands. I am aware of  
birds in private lands, in Louisiana, mainly owned by timber  
companies where the attitude towards these birds ranges from  
at best, ambivalence, to at worst, a desire for extirpation  
of these birds.

Let me suggest that you consider translocation of these  
birds to National Forest lands. This, I believe, would be  
welcomed by private land owners, where otherwise the birds  
stand poor chances of survival.

I am admiring and appreciative of your efforts on behalf  
of this southern bird.

Sincerely,  
*Allen J. Herbert*  
Allen J. Herbert, M.D.

Response to Comments in Letter No. 13  
From: Allen J. Herbert, M.D. M.P.H.

Comment No. Response

1. Translocation, a recently developed technique for RCW management, is being used on a limited scale between populations on Federal land. Movements of RCWs from private land will have to be approved by the USDI Fish and Wildlife Service.

Response to Comments in Letter No. 14

From: Rick Rushing

Comment No. \_\_\_\_\_ Response \_\_\_\_\_

1. Comments noted.

(14)

1/4/94  
Mr. Rick Rushing 606-269-0085 (Ky)

Oral Comment on RCW

Called 11:05 AM - Left Message on answering Mach.  
Returned call 2:00 PM

Supportive of Mgmt re general -

Also ~~would~~ would like to see more  
wilderness -



Tim and Peg Taylor  
Good Spring Farm 34  
Sawyer, Kentucky 42644  
Parkers Lake

1/10/94  
RCW (15)

January 5, 1994

Joe Dabney  
RCW Team Leader  
USDA Forest Service  
1720 Peachtree Road NW  
Suite 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

We read with interest and approval of the Forest Service plan to set aside 20,000 acres in the DBNF for RCW habitat, (Lexington Herald Leader, 12/17/93). Our farm is surrounded by the DBNF and we maintain it as a wildlife sanctuary in addition to maintaining about 20 acres of grassland for cattle and horses. The "x" on the map marks the approximate location of Good Spring Farm.

We are particularly interested in the RCW project because the woodpecker was a familiar sight to members of the Taylor family between 1924-1935. Grant Taylor and his sons Timothy, George and James were and are known as "birders" in the community. Since George and Tim bought the land from their father, Grant, in 1972, no RCWs have been sighted on the farm. For historical and ecological reasons, Timothy and George are keen to help with the establishment of habitat for the reestablishment of RCW colonies.

To help with the project we offer our farm as a site for nesting holes and we offer to help in any other way that would be useful to establishing, studying and observing the birds.

Since 1972 our farm has been an ongoing study as a managed grassland ecosystem. We have also managed our woodland for timber production and we have managed plantings in other open areas to promote wildlife. Personnel from the Somerset Ranger District, the ASCS and Ky forest service have been helpful to us. Botanists from the University of Kentucky have cataloged the flora and we have carefully studied the history of the Cumberland Plateau.

For good reasons related to conservation and our goals for our farm, we applaud the proposal to preserve RCW habitat, and we would be glad to help. That our farm is surrounded by the DBNF makes plans for the forest that much more important to us. Please contact us if you need more information or if we may be of assistance.

Sincerely yours

*Timothy H. Taylor*  
*Peg Taylor*  
Timothy H. Taylor (606-576-5042)  
Peg Taylor

cc: Jerry Stephens, Ranger  
DBNF, Somerset District

Response to Comments in Letter No. 15

From: Tim and Peg Taylor

Comment No.

Response

1. Habitat Management Areas (HMA) will be determined by existing populations of RCW. Public and private lands combined in an HMA could occur through a Memorandum of Understanding (MOU) if the area has the potential for RCW management.



✓✓

1/10/94  
RCW (16)

5 January 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road  
N.W., Box 718 N  
Atlanta, Ga. 30367

Dear Mr. Dabney,  
Received Draft Environmental  
Impact Statement for the  
Management of the Red-Back-  
ed Woodpecker and its Habitat  
on National Forests in the Southern  
Region. Thanks for its. It is  
a job well done. Will place  
it in our local library.

Enclosed the Alejandro  
Daily Town Talk, Jan. 9 & article  
Statement Seeks Public Comment.

The choice for habitat to be in 105  
great pine," he said. "The longest  
pine ecosystem has dwindled (404) 347-5007.

Alejandro Daily Town Talk  
P.O. Box 7558, Alapaha, Ga. 31706

Response to Comments in Letter No. 16

From: SMS Henry J. LaCour

Comment No.

Response

1. Comment noted.

116

Last year I saw 6 Red-cockaded Woodpeckers 7 miles from Alexandria, La. North Circle Highway I - where I live. It seems our birds population is decreasing.

Keep up the good work for our forests and birds. Thank God, a Half Course is a habitat for the birds.

Hope my letter add joy to your day.

With best regards, and God bless you.

A Patriot

Henry Louis



SMS Henry J. LaCour  
USAF Retired  
3 Dottie Lane  
Boyce, LA 71409-9617

The bird likes longleaf pine. said Mark Webb, timber range and wildlife staff officer with Kisatchie. As acreage of longleaf pine has fallen across the South, so have the bird's numbers, he said.

"The RCW has shown a real choice for habitat to be in longleaf pine," he said. "The longleaf pine ecosystem has dwindled

on the red-cockaded woodpecker draft environmental impact statement or the summary through March 25, 1994. Comments or requests for copies may be sent to Joe Blaney, RCW Team Leader, USDA Forest Service, 1720 Peachtree Road, NW, Suite 718 N, Atlanta, Ga. 30387. The telephone number is (404) 347-5087.

Alexandria Daily Town Talk

P.O. Box 7558, Alexandria, La. 71306

(17)

RCW  
1/14/94  
Comments

January 9, 1994

Robert D. Verret  
11615 Cherry Point  
P O Box 1321  
Mont Belvieu, Texas 77580

United States Department of Agriculture  
Forest Service Attn: RCW/EIS Team  
Suite 951-1720 Peachtree Rd. NW  
Atlanta, Georgia 30367-9102

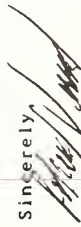
Dear Sir,

Thank you for the opportunity to comment on the proposed standards and guidelines concerning RCW Habitat Management.

I support balanced use of our National Forests. My family and I have used the Angelina National Forest, Boykin Springs area, for over twenty years now. This area is one of the very few areas in the State of Texas open for ORV use.

My concern is that certain extremist environmental groups are using the RCW habitat issue to block recreational ORV use in our National Forests. The Red-cockaded Woodpecker has existed in the Angelina National Forest as long as we have been going there. Judging by the number of trees marked, their number is greater than ever. Amazingly, many of the trees marked as nesting trees fall next to, or on, ORV trails that have been in use for ten years or more. Based on my own observations, I have serious reservations about the validity or accuracy of these environmental studies. However, we, as conscientious users of the National Forest, are willing to work with the Forest Service and other authorized agencies to protect and preserve our National Forests for both nature and mankind.

Sincerely,



Robert Verret

Response to Comments in Letter No. 17

From: Robert D. Verret

Comment No.

Response

1. The proposed alternative would prohibit construction of off road vehicle trails as well as other concentrated use within clusters, recruitment stands and replacement stands. The Forest Service will relocate or modify existing uses and activities if they are found to adversely affect the RCW. If an RCW should excavate and occupy a cavity near an existing facility or trail, the facility or trail would not be relocated unless monitoring indicates an adverse effect on the RCW.

1/14/94  
RCW

(18)

January 11, 1994

Gentlemen:

I read your announcement regarding the efforts to save the old Oberkahl woodpecker in the McHenry County Record. you have me all excited. I saw that bird back in the 1930's.

My Brother Mr. Tim Taylor & his wife Mr. Peg Taylor own 200 acres near Cumberland Falls; Almost all the land bordering us is the Cumberland National Forest. Three miles down stream at the head of Cumberland Lake: west side of River. I think it would be an ideal place to establish the R.W.C. we will cooperate in this effort 100%.

We have a good amount of wild life here: To name some: Pilated Woodpecker Wild Turkey. Deer. Coyote. & many of the more common species of birds & mammals. Lots of Eastern Blue Birds.

I have built & installed 32 bird houses. wild wood duck haven on our 200 acres.

Bro. Tim lives on the old home

Response to Comments in Letter No. 18

From: George P. Taylor

Comment No.

Response

1. Habitat Management Areas (HMA) will be delineated based on existing populations of RCW and will be managed at the Forest level.

place: & feed out more than  
500 lbs of wild bird feed each winter.  
If you & any representatives of this  
endorsement will be welcome to come  
visit. Look & see - directions to our  
place: My 90 Inn off on 896 3 mi.  
Right on Rock branch Road  $\frac{1}{2}$  mi. left  
on Swiler Creek Road 1 mi. to R Taylor  
branch Rd. to dead end and feed we  
are.

My best opinion as to establishing  
the S.C.W. would be to set aside  
three or four hundred acres of forest  
land joining us to the east & south.  
No cutting or disturbing; nature have  
a chance. where will we get seed  
stock?

With kindest regards for all  
nature lovers,

George P. Taylor



TEXAS COMMITTEE ON NATURAL RESOURCES  
4144 COCHRAN CHAPEL ROAD  
DALLAS, TEXAS 75209  
(214) 352-8370

January 11, 1984

(19)  
2-7 log sent

Mr. Joe Dabney  
USDA Forest Service  
1720 Peachtree Road, N.W., Suite 718 North  
Atlanta, GA 30367

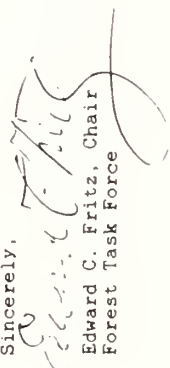
Dear Mr. Dabney:

Please send us a copy of the draft Red-cockaded woodpecker plan. Meanwhile, we already oppose logging under the so-called two-age system and logging of the oldest pines that have the highest potential for cavity trees.

Furthermore, pines aged 70 to 120 years should not be logged by rotation. Selection management is the only system that should be used in RCW habitat.

We incorporate herein by reference the record in Sierra Club v. Espy (and formerly Yeutter) in the District Court, Eastern District of Texas.

Sincerely,

  
Edward C. Fritz, Chair  
Forest Task Force

ECF:edf

Response to Comments in Letter No. 19

From: Texas Committee on Natural Resources

Comment No.

Response

1. The selected alternative would prohibit timber harvest, cutting or killing of trees within clusters, recruitment stands, and replacement stands except where those actions would protect or improve RCW habitat. When removing pine trees in areas outside the above, these priorities would be followed for selecting pine trees to remain: 1) relict trees, 2) other potential cavity trees, 3) trees greater than 10 inches in diameter that are not potential cavity trees, and 4) trees less than 10 inches in diameter. With the rotations presented in the selected alternative, the foraging and nesting habitat would not be limited and fragmentation would be minimized. The Forests have the flexibility to implement any mix of even and uneven-aged regeneration methods to meet their site-specific needs.



**Tann H. Hunt**  
**Attorney at Law**

See 1-21-94

(20)

January 18, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service Room 718N  
1720 Peachtree Road NW  
Atlanta, Georgia 30367

Dear Mr. Dabney:

Thank you for sending me the summary regarding the red cockaded woodpecker and its habitat. Once again, I am in the position of advocating what you advocate, operating out of a trust that you do know what you are talking about. In other words, what I look for is the greatest protection by acres of acres and birds as is reasonably possible. More explicitly, I cast my vote/recommendation in favor of the proposed action.

For the record, my opinion is based on a belief that there is more at stake than the red cockaded woodpecker. In other words, the red cockaded woodpecker serves as the canary served in the coal mines of Pennsylvania and Kentucky.

Sincerely,

  
Tann H. Hunt

TriH/tt

**Suite 200 • 111 Beverly Court • Tallahassee, FL 32301**  
**(904) 681-9333 Fax (904) 224-1229**

Response to Comments in Letter No. 20

From: Tann H. Hunt

Comment No. 1 Response

1. Comment noted.

RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd NW, Rm718N  
Atlanta GA 30367

Dear Sir,

Jan 15, 1994

I am submitting a public comment on behalf of the Southeast Texas Offroad Riders club on the Draft Environmental Impact Statement for the Red Cockaded Woodpecker Management Plan. Our comments on the plan are as follows:

1. New trail construction should be allowed through RCW colonies outside of nesting season.
2. Artificial cavities and translocation of RCW should not result in trail closures by requiring placement of nesting sites more than 3/4 of a mile from existing trails.
3. Only US Forest Service employees using the best possible science possible shall study the effect ORV use has on RCW activity.
4. The population objective is too high for the available habitat in the Angelina National Forest.
5. There is no mention of Southern Pine Beetle control methods in the Habitat Management Areas.

Thank you for your consideration of our concerns regarding the RCW Management Plan.

Sincerely,

  
John Metivier  
Secretary

SETCORR  
1922 Miller Dr  
Bridge City TX 77611

(21)

Response to Comments in Letter No. 21

From: Southeast Texas Offroad Riders Club

Comment No.	Response
-------------	----------

- |    |   |
|----|---|
| 1. | See response # 17, comment #1.  |
| 2. | Artificial cavity placement and translocation of an RCW will not occur within a trail location.   |
| 3. | Comment noted.  |
| 4. | The Forest Service proposes to establish a population objective for each Habitat Management Area. Permanent population objectives are determined after the permanent HMA has been delineated and are based on the area of suitable RCW habitat within each HMA. Population objectives for recovery populations should be based on reproducing population size, i.e., the number of groups fledging young annually in a given population. Population objectives in support populations will be based on total number of groups. Reproducing population size is also critical in support populations. |
| 5. | The selected alternative will continue direction from the Southern Pine Beetle Record of Decision and EIS, except in wilderness RCW groups, which are considered non-essential and southern pine beetle (SPB) control would not be initiated. SPB control could be initiated within a wilderness to protect RCW groups or their foraging habitat if they are immediately adjacent (within 1/4 mile) to the wilderness boundary. Foraging habitat that occurs within wilderness will not receive protection from SPB.  |

200-1-21-78 (22)

June 19, 1994  
2608 Harmony Rd.  
Fountainville, KY 40299-2714  
Joe Dabney  
RCW Team Leader  
USDA Forest Service  
1120 Peachtree Rd. N.W. Suite 718 N  
Atlanta, GA 30367

Dear Mr. Dabney:

I recently read of your plan to set aside several thousand acres in the Devil Bone National Forest to protect the endangered red-cockaded woodpecker. I am very excited and pleased about this. We should set aside at least 10% of our land as wilderness and reintroduce species such as wolf, elk, bear, mountain lion, and other "non-game" species that were indigenous to our country, before we lose them forever. I have send the executive summary of the draft Environmental Impact Statement. Thank you.

Sincerely:  
Michael E. Thompson

Response to Comments in Letter No. 22

From: Michael E. Thompson

Comment No. Response

1. Comment noted.

**W. V. McCONNELL, LAND MANAGEMENT PLANNER / FORESTER**

1023 SAN LUIS ROAD TALLAHASSEE FLORIDA 32304  
(904) 576-7774

Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm 718N  
Atlanta, GA. 30367

THRU MARVIN MEYER, Acting Regional Forester

Dear Mr. Dabney:

This letter will suggest a major change regarding the identification and evaluation of the people-related impacts discussed in the RCW DEIS. A response to this suggestion will require a re-alignment of planning tactics, rather than only a revision of the document's contents. For this reason, I am submitting these thoughts for the consideration of both your team and the various line officers who have the responsibility for approving the final EIS.

In general, members of Forest Service ID teams are ill-qualified to deal with matters outside the domain of the natural sciences. The preparers of the EIS, listed in Chapter 4, include specialists in forestry, biology, zoology, ornithology and ecology. The team has no representation from the social or behavioral sciences, nor does it include an environmental economist. This circumstance has resulted, in my opinion, in a document which considers humanity as peripheral to, rather than a part of, the ecosystem. The document focuses almost entirely on "things" and their relationship to each other and treats RCW management as a regional activity unrelated to national or global concerns. Most distressing is the planners' assumption that estimating the reductions in timber harvest, jobs and returns to the counties constitutes an adequate measure of social and economic impacts.

I'm enclosing an excerpt from a manuscript in preparation which deserves your study. Figure 2 is a dramatic illustration of the cumulative effect of a series of separately arrived at management decisions. Page 3 hints at the magnitude of the human impacts which have not been addressed in the DEIS. Page 4 lists some extra-regional impacts, again unconsidered in the DEIS.

If, indeed, the document is inadequate in these matters, the fault does not rest with the team members. Rather it lies with a selection system which has produced a team composed entirely of natural scientists. At the same time, any selection system which relies on in-house staffing for a F.S. ID planning teams faces an insuperable obstacle - the absence of available skills. The entire R-8 personnel roster includes only 2 social scientists!

ENERGY-WOOD MANAGEMENT

*Handwritten:*  
McConnell  
cc: Joe L. Rao.

Response to Comments in Letter No. 23

From: W. V. McConnell, Land Management Planner/Forester

Comment No.

Response

1. In the DEIS the biographical information on Dr. Richard Greenhalgh was left out. Dr. Greenhalgh was the economist in the Southern Region Office and was responsible for coordinating the social and economic analysis for the EIS. Prior to coming to the Forest Service, Dr. Greenhalgh worked 15 years with USDA, Economic Research Service. He has recently retired from the Forest Service.

To resolve the dilemma of need vs. availability, the F.S. must look outside its own organization. The University of Florida is in the process of creating a new interdisciplinary College of Natural Resources and the Environment whose focus will be on the relationship between natural systems and society. As Dr. Nancy Arny, Co-director for UF's Center for Environmental Education, puts it, its goal will be "understanding the connection between the environment, humans, and the economics and policies that affect people".

This focus, and the combination of interdisciplinary skills which will be available, seems to meet, ideally, the planning needs of the Forest Service. You may wish to consider using, as a "consultant/collaborator", a team of University faculty who will be affiliated with the new college. This team could provide the Forest Service ID team with the perspective and expertise needed to prepare a defensible assessment of social and economic impacts.

I would visualize that the "consultant/collaborator" team would continue to function as an entity after the organization of the new college is formalized. The concept could have wide and continuing application as National Forests throughout the region begin revising or amending their Forest Plans.


If you wish to pursue this thought, contact:

Dr. Nancy P. Arny  
Department of Forestry, Cooperative Extension  
University of Florida  
Gainesville, FL 32611-5420  
(904) 392-5420

This letter and its attachment deals with the "people" aspects of the DEIS and suggests a solution to that problem. A later letter will discuss the technical questions of foraging needs and rotations.

Having said all of the above let me add that the fundamental thesis of the DEIS, "Recovery through Management", is exactly what is needed. A more people-oriented view, together with modified harvesting limitations, could result in truly "ecosystem" management. Such a multi-resource approach would allow the timber resource to serve as the "action" partner, supplying the tools (including funding through KV) for RCM recovery while meeting society's needs for renewable commodities.

Very truly yours,

  
W.V. McConnell

attachment

cc: Nancy Arny, UF Dept. of For., Coop. Extension  
Donna Hepp, Acting Forest Supervisor, NFs in  
Jack Ward Thomas, Chief, FS



WILDLIFE CONSERVATION COMMISSION  
 WILLIAM CRANKFORD JOHN S. "JACK" ZINK  
 CHAIRMAN MEMBER  
 DON RITTER JOHN D. GROENDYKE  
 VICE CHAIRMAN MEMBER  
 JACK FRISBIE HARLAN STONECIPHER  
 SECRETARY MEMBER  
 ROBERT L. HUTCHINS MARK PATTON  
 MEMBER MEMBER



DEPARTMENT OF WILDLIFE CONSERVATION

DAVID WALTERS GOVERNOR 2/8/94  
 GREGG DUFFY, DIRECTOR

1801 N. LINCOLN P.O. BOX 53465 OKLAHOMA CITY, OK 73105 PH 521 3651

February 1, 1994

Mr. Joseph M. Dabney  
 RCW EIS Team Leader  
 US Forest Service  
 1720 Peachtree Rd. NW, Rm 718N  
 Atlanta, GA 30367

Dear Mr. Dabney:

We appreciate the opportunity to review the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region. This document is comprehensive and thorough and is a credit to you and the other members of the RCW EIS team. We support the preferred alternative and landscape level of management it entails.

A few comments and questions occurred in reviewing the DEIS. These are:

1. Although no RCW's are known to occur on National Forest lands in Oklahoma, the Tiak District of the Ouachita National Forest has two inactive clusters. Would an HMA be delineated for these clusters or does management of the sites lie outside the scope of the DEIS.
2. The statement on page 21 that "The proposed Handbook revisions would not control southern pine beetles in wilderness to protect wilderness RCW groups or foraging habitat." seems too inflexible. Research being conducted with pheromones such as verbanone may provide control methods that do not require the cutting of trees. The option of using new methods that are compatible with wilderness values should be considered.
3. On page 44, methods listed to eliminate larger hardwoods include drum chopper and shearing blade. Because these methods may damage the roots of pines and compact soil, they may increase the susceptibility of pines to SPB's. Guidelines should be provided regarding the use of these methods in relation to the location of cluster trees and the SPB level in the area of use.
4. Translocation of RCW's, we agree, is essential in managing and recovering populations, and the guidelines (i.e. moving short distances and within subpopulations) are

Response to Comments in Letter No. 24

From: Greg Duffy, Department of Wildlife Conservation

Comment No. Response

1. Delineation of an HMA is required for all known RCW groups that have been active since 1986. HMA delineation is optional for RCW groups that were active prior to that time.
2. Verbanone is still experimental and does not have EPA approval for widespread use. See response #21, Comment #5 for information regarding SPB control in Federal wilderness. The guidelines apply only to Federal wilderness.
3. Comment noted. In areas where there are risks or impacts of southern pine beetles to an RCW cluster, a biologist and entomologist would recommend a course of action before taking control measures. Before removal of midstory hardwoods, all methods and their impacts would be considered before selecting a preferred method of removal.
4. We are currently working with the U.S. Fish and Wildlife Service (USFWS) to identify donor and recipient populations including federal, state and private lands. Priorities for translocation are established each year in conjunction with the USFWS.



24

Mr. Joseph M. Dabney  
Page 2.

commendable. We hope that the Forests will not be limited to exchanging RCW's only with other National Forests. The translocation of RCW's among populations occurring on federal, state or private lands should be allowed when the exchanges meet the guidelines and are beneficial to the populations.

Sincerely,



Greg Duffy  
Director

GD:cs

Enclosure

REC REC 2/1/94  
(25)

Sam Booher  
4387 Roswell Rd.  
Augusta, Ga 30907  
31 January 1994

Joseph Disney  
RCW Team Leader

Dear Mr Dabney,

Having studied your plan, I am pleased with many of your new concepts. Not only do I believe they will help bring back the RCW, but I believe they will help save many of our other sensitive species that are also in trouble and found in pine forests with the RCW.

I especially support:

- the longer rotations to have old trees.
- no management of Wilderness Areas.
- Moving RCW to unoccupied areas.
- thinning and midstory management.
- artificial cavities to establish new colonies.
- manage for all Endangered plant & animal species.
- Clearcut ONLY to restore Native Plants.

While I support you having all management types of options, I can support Clearcutting ONLY as a means to return Native Plants (ie. Long Leaf Pine and others). Clearcutting by itself is NOT a satisfactory forest management tool. It is comparable to an asphalt parking lot as a good forest management tool.

Last, I am concerned about road building. I offer we have more than are needed for Forest management. If we are going to restore the RCW and the insects needed for its survival, we need to keep roads out of wildlife habitat. I would hope that the next evaluation of this plan include planting trees in current road-ways to stop ORV and hunting vehicle traffic in wildlife habitat areas.

While I DO understand the need to burn understory, PLEASE keep foremost in mind the need to bring back native plants and small non-game wildlife (especially the insects needed as a food source for the RCW). In a burning season is correct for their restoration and life cycles.

I oppose use of herbicides. With this said, stem treatment to bring under control understory could be a last option. Again, herbicide will destroy RCW food sources unless trees are left to decay which could support a food source.

I was pleased you are getting away from the 3/4 mile circles and have gone to eco-system landscapes.

Overall you have made a lot of progress. Maybe that is a light at the end of the tunnel and no longer the train of extinction coming at us in the tunnel.

Your efforts are appreciated. Maybe the public does not tell you that often enough.

Sam Booher

I guess this is I am  
Option 1 Supply.

Response to Comments in Letter No. 25

From: Sam Booher

Comment No. Response

1. Comment noted.
2. Comment noted. See Response #17, Comment #1.
3. See response to your previous letter (#1) Comments #1 and 6.
4. Herbicide treatment for midstory control is one of several tools that may be used. See response to your previous letter (#1) Comment #2.
5. Comment noted.
6. Comment noted.

# SIERRA CLUB



## LONE STAR CHAPTER

Jan. 28, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd., NW, Rm 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

Thank you for the copy of the Draft EIS for RCW Mgt. in Region 8. *would work.*

One point we have not been able to understand, even after reading the Draft, is just how saving 1/3 of oldest trees to "within 10-20 years of rotation age." We guessed the writer really meant "beyond" rotation age rather than "within", which would commonly be understood to mean below rotation age.

Perhaps you could send us an example, showing how through time a hypothetical timber stand and compartment would be harvested, with age-class distribution for each decade.

We would really appreciate your help.

Sincerely,

*Tom Maddux*

Tom Maddux  
Chairman, National Forest Protection Campaign  
3400 Ocee, Apt. 212  
Houston, TX 77063

(713) 782-4977

*Let's rotation 2/3 of oldest trees. It will be good if most of oldest trees respond with an example.*

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." John Muir



Response to Comments in Letter No. 26

From: John Maddux, Chairman, National Forest Protection Campaign

Comment No.

Response

1. Two examples were sent to Mr. Maddux on March 3, 1994 explaining the ideas of the rotation time in the proposed action.

27

# Mississippi Federal Timber Council

February 9, 1994

Honorable G. V. Montgomery  
United States House of Representatives  
Federal Building  
Meridian, MS 39301

Dear Congressman Montgomery:

Recently we wrote you informing you of the formation of the Mississippi Federal Timber Council. In that letter we expressed concerns about the impacts the Red-Cockaded Woodpecker could have on the management of National Forest Lands in Mississippi and especially the forest products from the lands.

Recently the U.S. Forest Service in Atlanta, GA issued a draft environmental impact statement for the management of the bird on the National Forests in the south. If the Forest Service implements the preferred alternative it could cause drastic changes on how National Forest lands are managed and cause severe economic hardships on forest industry and many school districts and county governments in Mississippi.

The plan, if implemented, will set aside 329,083 acres on the DeSoto, Bienville and Homochitto National Forests to be managed primarily for the bird and will permit only minimal timber harvesting. Currently there are 125 colonies of birds on these forests. However, government biologists have set a population objective of 1,430 colonies. Currently, the Forest Service is moving birds from Florida to stock the areas.

As you know, these lands have traditionally been a significant contributor of raw materials to the state's forest product industry. Since 25% of the gross receipts from timber sales are returned to school districts and Boards of Supervisors, the economic benefits are substantial. In 1992, over \$6 million was returned to the state from these funds. If the new plan is implemented, these receipts would be reduced by about \$2.2 million. The counties where the birds are located would be hit especially hard.

We totally support the need to manage and improve our endangered species. However, we have the following concerns: (1) Because of the very low reproduction rate of the bird, we question if the population goals can be reached? The average life span of the bird is 4-5 years. Forest Service Biologists say that the population has not increased during the last 10 years. The plan calls for setting aside 100,494 acres on one area of the DeSoto National Forest that now has only two colonies of one male each. Clearly the odds of recovery, in this case, are negligible. The economic trade-offs are staggering in terms of economic growth, job losses and tax revenues; (2) There may be long term impacts of woodpecker management on other wildlife species such as deer, turkey and squirrel. The bird requires open park-like forests and the plan encourages the reduction of hardwoods in pine forests; (3) The plan requires that foraging areas be established now although the bird may not expand into it for 10-20 years or possibly never. In the meantime, no timber will be harvested for at least 10 years and in some cases 30 years or more. During this time millions of board feet of timber will be wasted. We do not believe this is reasonable and certainly not practical on 329,000 acres of prime timber land; (5) Finally, the implementation of this plan could have severe impacts on local communities such as that created by the spotted owl in the Pacific Northwest. Of course, the loss of this revenue must be made up and we know that that must come from tax increases.

620 North State Street, Suite 201, Jackson, MS 39202. Telephone (601) 354-4952  
Affiliated with the Mississippi Forestry Association

Response to Comments in Letter No. 27

From: John Behan, Mississippi Federal Timber Council

Comment No.

Response

1. The policy for managing National Forest lands in the Southern Region for RCW has been evolving since this bird was first listed in 1970. The selected alternative represents a balance between short term economic effects and sustainable timber supplies for the future.  
  
Economic impacts will be incurred in many areas dependent on timber-related jobs, income and payments to the states. The degree of impact will decrease with time as the stands currently in the 0-30 age classes grow older. This will once again allow harvest of sawtimber. The forest will develop a balanced age/size class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat and providing income to rural areas. Changes have been made between draft and final EIS in response to Senate Resolution 285 which should minimize short-term economic impacts.
2. There will be very little impact on wildlife species such as, deer, quail and wild turkey. Some smaller hardwood trees and shrubs may be eliminated or greatly reduced through prescribed burning and other midstory control measures. This could result in a decrease in availability of mast on which some wildlife species are dependent. Some mast producing species would be enhanced by these measures. Overstory mast producers, if present, would not be affected. Since midstory species have limited mast production capabilities and most overstory mast producers will not be affected, the overall effect on mast dependent species is likely to be minimal.
3. The selected alternative allows for the restoration of longleaf pine on desirable sites beyond 1.5 miles from active clusters. It reduces the foraging habitat requirement by 50% under these circumstances. An important change from the DEIS, this responds to some of the short term impacts incurred by this plan.
4. Comment noted.

27

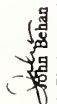
This plan will replace the plan implemented in 1985 which was recommended by a group of scientists familiar with the habitat needs of the bird and was approved by the U.S. Fish and Wildlife Service. The 1985 plan, requiring much less acreage, was a very reasonable and workable one that was very successful in South Carolina and Florida. Because of a threat from an environmental group, that plan was suddenly aborted in 1988 before it had a chance to work here in Mississippi. At that time, a different scheme called "Interim Guidelines" was implemented which, in many cases, goes far beyond what scientific evidence suggests as being necessary.

On behalf of our Council, as well as the forest products industry of Mississippi, we request that you intervene in this issue and insist that the Forest Service immediately drop this atrocious scheme of unnecessarily removing land from production. We further request that you insist that the Forest Service return to the 1985 plan since it has been proven successful in recovering the Red-Cockaded Woodpecker

The comment period will close on March 25 and the final decision will be made by the Acting Regional Forester, Mr. Marv Meier, 1720 Peachtree Road, NW, Atlanta, GA 30341.

Enclosed, for your review, is a summary of the Draft Environmental Impact Statement. We appreciate your support in this issue and your continued support of the forest industry of Mississippi. Should you need further information, please contact me or our consultant Mr. Gene Simon, 620 North State Street, Jackson, MS 39202.

Sincerely,

  
John Dehan  
Chairman, Mississippi Federal Timber Council

Enclosure



Department of Education  
Smith County

C. M. BOYLES, SUPERINTENDENT  
P. O. BOX 308  
RALEIGH, MISSISSIPPI 39153

February 18, 1994

RCW EIS Team Leader  
U. S. Forest Services  
1720 Peachtree Rd., N.W.  
Room 718 N  
Atlanta, GA 30367

Dear Sirs:

It has come to our attention that a large portion of the national forest land in our county is targeted for inclusion in a Red-Cockaded Woodpecker Habitat Management Area. (RCW HMA) We, as governing body of the Smith County School District, respectfully request that the following considerations be addressed before this is finalized.

The Act of October 20, 1976, authorizes the Secretary of the Interior, through the Bureau of Land Management, to make annual payments to local units of government containing certain federally owned lands. The various states involved are entitled to 25 percent of monies received from the Proclaimed National Forests within the State for the benefit of roads and schools in the counties where the National Forests are situated. If the area in our county is designated as a RCW HMA, our school district will lose considerable income from the national forest payments, to which we are entitled by the Act of 1908 and the Act of 1976.

While we very much support saving the RCW HMA, we feel that there are more appropriate means for accomplishing this task than that of long term timber cutting rotation. Many studies indicate that the RCW is quite adaptable to artificial housing attached to much younger trees. As a matter of fact, studies show that the RCW prefers this type of housing to the traditional "older tree" housing. Also, there should be taken into consideration the fact that there have been no sightings of RCW active clusters in our county and none available to be relocated here.

2  
3

Response to Comments in Letter No. 28

From: C.M. Boyles, Superintendent Smith County Department of Education

Comment No. Response

1. The selected alternative will bring about changes in timber volumes and subsequently timber-related jobs, income and payments to states. Keep in mind that there are many factors to be considered when examining the timber supply from a National Forest. See Response #27, Comments #1 and #3.
2. Artificial cavities are installed in RCW sites where there are less than four useful cavities per cluster. These artificial cavities require maintenance on a regular and continuing basis for them to be useful. For the long term viability of this species, it is better to grow older trees and let the birds choose where to excavate cavities.
3. The proposed HMA in Smith County, Mississippi is part of a plan for a recovered population of RCW in that physiographic province as called for in the Recovery Plan for RCW. Historically, this area provided excellent habitat conditions for this species.



28  
page 2

We respectfully request the U. S. Forest Service to recommend a method that will protect the environment of the Red-Cockaded Woodpecker and at the same time allow Smith County to continue to receive National Forest payments in lieu of taxes. The impact of what is being proposed by the U. S. Forest Service cannot be measured in terms of the RCW - you must take into consideration the people who live in these areas and send their children to the public schools.

Sincerely,



C. M. Boyles, Superintendent  
and Members of the Smith County School Board  
Freddy Martin Paul Cockrell  
Danielle Garrison Mickey Westbrook  
Wayne Culliver

CMB:cb



## City of Austin

Founded by Congress, Republic of Texas 1839  
Municipal Building, Eighth at Colorado P.O. Box 10888, Austin, Texas 78767 Telephone 512 499-2988

January 17, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

On behalf of the Texas Recreation and Park Society, I would like to comment on the Draft Environmental Impact Statement for Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region.

Maintaining good habitat for the woodpecker and other fauna in the National Forests is of concern to us as an important factor in recreational use of these lands as well as in ecosystem management. I urge you to adopt a policy of no single-age forests throughout this region.

Regarding management of the National Forests, I also urge you to adopt a conservative approach to removal of mid-story growth in the woodpecker habitat. I urge you to eliminate the use of herbicides.

If you have any questions about my comments or wish further elaboration, please let me know.

Sincerely,

*Jody R. Hamilton*

(Ms.) Jody R. Hamilton, Marketing Manager  
Austin Parks and Recreation Department  
also Past President, Texas Recreation and Park Society  
(512) 499-6714

RCW  
2/22/94  
(29)

Response to Comments in Letter No. 22

From: Jody R. Hamilton, Austin Parks and Recreation Department

Comment No. Response

1. The selected alternative will provide the option of using both evenaged and unevenaged management to provide for suitable habitat for RCW in the proposed Habitat Management Areas (HMAs). The selected alternative calls for a two-aged forest management system
2. Regarding the control of midstory vegetation and the use of herbicides, see Response #1, Comments #1 and #2.

(30)

ECW 2/17/94  
2/22/94

Joe Dabney  
RCW Team Leader  
U.S.D.A. Forest Service  
1720 Peachtree Rd NW, Suite 718 N  
Atlanta, GA 30367

I am writing to voice my support to set aside 20,000 acres in south-central Kentucky to help protect the Red-cockaded Woodpecker. I understand that fewer than 4,000 of these birds exist and very few in Kentucky.

How wonderful it would be to see these beautiful birds make a comeback in Kentucky, and all other near-extinct birds as well.

I'd appreciate anything you can do to help this project. Thank you so much.

Dixie Roebker

Response to Comments in Letter No. 30

From: Dixie Roebker

Comment No.

Response

1. Comment noted.

(31)

Mr Joe Dabney, RCW Team Leader  
USDA Forest Service  
1720 Peachtree NW, Suite 718N  
Atlanta GA 30367

RCW  
2/24/94

February 22 1994

Dear Mr. Dabney,

I am writing to urge you and the Forest Service to do all possible to protect the endangered red-cockaded woodpecker and it's habitat. This is a precious species that we should do all possible to save. Too many species and too much forest land are being lost and woodpeckers are especially vulnerable since they need old growth trees. Please help them.

Very truly yours,  
*Mary Nuckols*

Mary D Nuckols  
Nuckols Farm  
P O Box 4276  
Midway KY 40347

Response to Comments in Letter No. 31

From: Mary Nuckols, Nuckols Farm

Comment No.

Response

1. Comment noted.

(32)

RAW  
2/24/84

**Wildlife Wood Carving**

Tim Hall  
517 Elm Street  
Ravenna, Kentucky 40472  
606-723-5450



2-28-94

Dear Sir,

I hope the Forest Service will do everything in their power to protect the endangered red-cockaded woodpecker.

I have been very much logging of our National Forest. I have witnessed the clear cuts since my youth. They haven't grown back. They are still thickets. The private lands are being stripped out so public land should be saved for all. We have a very short sighted policy on our forest.

Sincerely,

Tim Hall

Response to Comments in Letter No. 32

From: Tim Hall, Wildlife Wood Carving

Comment No.

Response

1. Comment noted.

Response to Comments in Letter No. 33

From: Mr. Robert M. Taylor Jr.

Response

Comment No.

1. Due to the range of alternatives presented, the variation of environmental settings across the Southern Region, and status of individual RCW populations, a document of this nature tends to be complex. The preparers of the DEIS made every attempt to make the document readable and understandable. While some reviewers commented that this very complex technical subject has been handled very well, some may still find it overly complex.
2. Chapter 3 of the FEIS describes the affected environment and discloses the environmental effects and impacts to the physical, biological and economic factors associated with RCW protection and management under each alternative.
3. The full-time and part-time team members responsible for preparing the FEIS represent a variety of disciplines including wildlife biology, ecology, silviculture and zoology. They provide extensive experience in timber management, recreation, threatened and endangered species management, forest management, population dynamics, RCW research and prescribed burning.
4. Information in the FEIS is for the protection and management of RCW populations on National Forest System lands only. It would not apply to other federal, state or private lands.
5. Comment noted. The frequency and season of prescribed fire as described in the FEIS is generally expected to control competing woody species. Where this does not occur, the use of herbicides may be used under certain circumstances and restrictions. Site-specific information will dictate which technique(s) will be most successful.
6. The successful regeneration and establishment of pine stands is essential to providing RCW habitat in the long-term. The selected alternative in the FEIS establishes rotation lengths of 70-120 years (depending on forest type). Forest regulation under a given rotation will provide sustainable yields of forest products over time by striving to achieve a relatively balanced age class distribution. Regeneration may occur in some stands prior to their reaching rotation age after the oldest one-third acres have been protected thru the first rotation. This would allow for opportunities

(33)

REC.

ACN

3/2/94

Route 2, Box 1549  
Centreville, Ala.  
February 14, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Rd. NW, Room 718N  
Atlanta, Georgia 30367-9102

I have reviewed the Draft Environmental Impact Statement (DEIS) for the Management of the Red-cockaded Woodpecker and its Habitat on the National Forests in the Southern Region and have both general and specific comments for your consideration. In summary, I believe this DEIS will help to insure that the RCW populations will continue to decline in the long run.

#### General Comments--

--The DEIS is overly, and unnecessarily, complicated. I have studied it for many hours and I still don't fully understand it. In discussing it with others, I find that I am only one of a very large group. I have worked in the Southern Region for over thirty years and I have never seen a more confusing document. With all of the complicated formulas, their exceptions, and exceptions to the exceptions, the Forest Service is laying the groundwork for a field day for special interest lawyers. The FS will be in litigation when this document is approved because on-the-ground work is being done and/or because on-the-ground work is not being done. I have yet to meet anyone (including National Forest line officers and scientists) who understands what is being proposed and/or the rationale for those proposals. The answer: I get usually, start with "I believe this is what is meant....".

--The DEIS does not meet the intent of NEPA or NPSA because it does not consider the impacts on all resources. This document is a draft EIS only because it is labelled as such on the front cover. This document could more appropriately be titled "Management Plan for the Red-cockaded Woodpecker" (with alternatives).

--The preparers of this document are not representative of the disciplines needed to prepare a natural resource document that will assure the desired objectives of all resources are met. For the most part, with a couple of exceptions, it is a single-use document prepared by a group of wildlife biologists hell-bent on forcing their views on the public. The writers either chose to overlook, or ignore, many basic scientific facts. For this reason the plan is doomed for failure in the long run.

1.

2.

3.



33

4. --The selected alternative does not correlate with what is required and practiced for the recovery of the RCW on U.S. Fish and Wildlife managed areas. Why the difference? Is it necessary? What are the ulterior motives for this document? I believe that it is simply to stop harvesting timber on the national forests as soon as possible.

5. --The DEIS does not sufficiently address what the impacts of prescribed burning, thinning stands, natural regeneration, and stand mortality due to old age and insect and disease will have on exotic species such as kudzu, privet hedge, cogon grass, etc., and what the impacts of expected, dramatic, acreage increases of these exotic species will have on all native ecosystems. On the National Forests in Mississippi there are currently 5000-10000 acres covered with kudzu and privet-hedge. Failure to manage for control of these species will cause a dramatic increase in acreage to be lost from native species management. Managing for control of exotic species may be in direct conflict with what is necessary for "good" RCW habitat. Where exotic species are a threat to native ecosystems the DEIS must evaluate whether to manage for a "poor" RCW habitat where exotic species are controlled, or to simply ignore scientific facts, open up the stands, and lose the area entirely to those species. If forests are not managed to minimize the growth of exotic species but are managed only for the RCW where exotic species are present, there could be a dramatic loss of acreage (perhaps ten-fold) from native species within the next ten years.

6. --The DEIS does not meet the needs for long range recovery of the RCW. In fact, if the selected alternative, with all the emphasis and restrictions on reestablishing a declining ecosystem, is implemented, the RCW will most certainly be put in jeopardy in the long run. This is because there is not an even distribution of age classes in the HMA's at the present time, and failure to pursue this objective as soon as possible will cause a serious loss of habitat eventually. A basic fact being ignored in this DEIS is that a forest will produce only a limited amount of products on a sustained-yield basis. This is true whether the product is timber, deer, clean water, old age stands, etc., or RCW. Failure to recognize this basic fact, and to plan for its eventuality will cause an uneven flow of products, over time. If the "proposed" alternative will cause a short-term increase in RCW recovery, it will most certainly cause a "crash" in RCW populations in a few years when old stands die and desirable habitat decreases to less than half of current areas. It makes no sense to "recover" the RCW at the expense of millions in taxpayer money, and the loss of the past 60 years management on two million acres (TWO MILLION ACRES!!! THIS IS APPROXIMATELY ONE/SIXTH OF THE TOTAL NATIONAL FOREST ACRES IN THE SOUTHEAST) only to see the RCW decline to less than one half of the current population in less than 50 years.

to minimize any "bulges" in the existing age class distribution.

7. Comment noted. There are many plant and animal communities associated with the same fire dependent ecosystems which support(ed) healthy RCW populations. Because the establishment of relatively large Habitat Management Areas (HMA) provides consistent forest management at the landscape scale, these plant and animal communities will also benefit from this approach.

8. Comment noted.

9. As stated earlier, this management strategy is intended for National Forest System lands in the Southern Region only.

10. The use of prescribed fire is essential to maintaining RCW habitat by controlling the woody midstory and improving the herbaceous understory. Funding for prescribed burning activities is expected from a combination of appropriated and K-V related sources.

11. Economic impacts will be incurred in areas dependent on timber-related jobs and income and reliant on payments to the counties. However, the degree of impact will decrease with time as stands currently in the 0-30 age class grow older. The preferred alternative also provides opportunities to lessen the short-term impact through pine restoration and use of the sub-HMA strategy. This will allow the forest manager to move towards a balanced age class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat while providing income to rural communities.

12-15. The impacts to other threatened and endangered species, other animals, and the social and economic environments are broadly discussed in Chapter 3 of the FEIS which describes the affected environment and environmental consequences of each alternative. Additional effects analysis on each of these will occur as individual National Forests incorporate this strategy into their revised Forest Plans. Some of the questions you raise may be beyond the scope of this document.

16. With the exception of Alternative D, each of the alternatives described in the FEIS establish minimum rotation lengths which provide for some level of regeneration to eventually provide a relatively balanced age class distribution. Due to the existing acres in the 0-10 or 0-30 age classes, some HMAs may be restricted in the amount of regeneration that can occur within the next 10-30 years. As stated earlier, the preferred alternative allows some opportunities to minimize these short-term impacts.

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--This DEIS is being touted as an "ecological" approach to managing the endangered species habitat. Nothing could be further from the truth. One of the first things the new chief instructed FS employees to do was to "obey the law and to tell the truth". This document misuses the target on both points. This is NOT an ecological approach to anything. It is a single-use document and has no more ecological significance than a single-use timber plan growing pine trees in rows on a 20-year rotation.

--It was thought by RCW managers that old-growth trees were needed for successful RCW management prior to hurricane Hugo. When most of the required habitat was lost, managers soon learned that all the tree requirements were not needed for foraging or for nesting. In fact this "recovery" is considered a success story. Yet, in this DEIS after we know better, we go back to the same old, pre-conceived, and proven faulty, idea that the birds need a lot of nesting and habitat area. The truth is being handled a little loosely here.

--Although the requirements in this DEIS do not directly affect what will happen on private lands, its implementation most certainly will be used by special interest groups as an example of "good" RCW "management". This DEIS cannot be totally separated from the private land issue.

--If the RCW needs "low ground cover" to survive, it makes little sense to leave an overstory to furnish a continuous supply of seed which will give just the opposite effect. Loblolly pine will drop seed almost every year in abundant amounts and the understorey cannot be controlled without a great expense in dollars and manpower. These funds will not be appropriated and will not be available, for the most part, from R-V sources as this DEIS will effectively stop timber harvesting in much of the area. This policy will also lead to loss of the desired habitats.

--Regionally, the economic impact of this DEIS will be significant, but locally, in some communities, it will be devastating. It is criminal, in my opinion, to waste 60 years of timber management by the taxpayers for a system of "ecosystem" management that will not achieve the desired results on a sustained-yield basis.

--The DEIS does not examine the impacts to each of the other T&E and associated species in each of the National Forests. The habitats for each of these species must be examined and impacts of the proposed RCW habitat considered. In addition to all of the species which are currently listed as T&E, there are a number of candidates for such listing in the South. Following is a list of the number of candidates by state: MS - 96, Ala - 310, GA - 217, FL - 328, NC - 226, SC - 129, TN - 235, Arkansas - 101, LA - 65, and TX - 306. The impacts of this DEIS proposal should be addressed for each of these species.

18. Again, forest regulation under a given rotation will provide sustainable yields of forest products, including old stands, over time by striving to achieve a relatively balanced age class distribution. Limiting regeneration in the oldest one-third acres thru the first rotation will ensure suitable potential nesting habitat in the short-term. Regeneration may occur in some stands prior to their reaching rotation age. This would allow for opportunities to minimize any "bulges" in the existing age class distribution and prevent all stands from being regenerated at one time.

19. As described in Appendix A, an individual RCW population objective is based upon suitable RCW habitat acres (pine and pine-hardwood) within a specific HMA.

20. Comment noted.

21. Please see response to comments #6 and #17.

22. Please see response to comment #10.

23. Some species of hardwood trees and shrubs may be eliminated or greatly reduced on upland sites through prescribed burning and other midstory control measures. This may affect wildlife species dependent upon mast at the stand level. However, the availability of mast from overstory hardwoods in pine and pine-hardwood canopies, hardwood and perennial and intermittent drains, hardwood and hardwood-pine stands, and bottomland hardwood stands will provide this important habitat component at the landscape level. Thus, some mast dependent wildlife species may be displaced from upland pine sites to sites with better hardwood capabilities; but would not be eliminated or even greatly impacted at the landscape level.

24. The literature describes RCW cluster site habitat as being relatively open and free of midstory encroachment. These are the attributes that tend to attract RCW to seedtree areas to excavate nesting and roosting cavities. Managing a HMA to provide many more sites with these attributes should decrease the attractiveness and use of seedtree areas. Depending on the management intensity level and the alternative, various amounts of reserve trees are left in seedtree and shelterwood harvest areas to provide suitable nesting habitat in the future stand.

25. The prescribed burning strategy in the DEIS is for suitable RCW habitat (pine and pine-hardwood) only. Environmental factors such as slope, soils, moisture and plant community composition associated with perennial and intermittent drains coupled with various prescribed burning techniques



33

- 13 --The DEIS does not examine the impacts to each of the invertebrates, amphibians, birds, mammals, and fish found in each of the National Forests.
- 14 --The DEIS does not examine the impacts on neo-tropical birds and the cumulative effects of an aging forest, followed by a forest largely in a state of regeneration, on all natural resources.
- 15 --The DEIS does not thoroughly examine the impacts that removing two million acres from production will have on the management of other forest lands. What will be the effects of obtaining the equivalent amount of forest products from unmanaged lands, such as the rain forests, that will not be put back into production? What effects will these actions have on neo-tropical birds, mammals, reptiles, etc.?
- 15 --The DEIS does not address the impacts the proposal will have on minorities and women in the future. As the majority of the workforce becomes women and minority these individuals will become the majority of consumers of forest and wood products. What effects will this DEIS have on their ability to purchase new homes and products as the cumulative effect of taking over TWO MILLION ACRES of area from the timber base. Two million acres is an area ONE MILE WIDE AND THREE THOUSAND ONE HUNDRED AND TWENTY FIVE MILES LONG. These acres would probably produce THIRTY BILLION BOARD FEET of timber within the next rotation if they were not being taken out of production for the RCW. This volume could furnish housing for at least a million new, single-family dwellings. What effect will this have on minorities and women?
- 16 Many, if not most, of the counties where the RCW is located are rural, poor, and contain a majority of "minority" individuals. Many of these individuals are heavily dependent on the forest and forest products industry, and will be effected most by the impacts of this DEIS. What undesirable economic effects are planned for these individuals, and how are we planning to mitigate these effects? What effect will taking two to three billion dollars from the 25% funds to counties have on minorities over the next few years?
- 16 --Emphasis in the DEIS should not be on the amount of regeneration planned or not planned, but instead, should be on establishing an even distribution of age classes over the desired rotation.

The first goal of the DEIS should be to determine the "future desired" forest conditions. This must be scientifically sound (for example, rotations must be within age limits of STANDS of the various species), and must be a condition that can be maintained in perpetuity. Failure to do this will result in a plan that is doomed to failure for the RCW from the start. The amount of regeneration now, during the next ten years, or in each of the succeeding decades will have no real effect on the timber resource in the long run (it will effect the amount of timber products to be removed from the forest).

and other protective measures will result in less frequent and less intense burns within these hardwood areas. The hardwood communities associated with the transition zones between the pine dominated uplands and the small stream floodplains as well as those within the riparian areas are expected to persist within the HMAs just as they did historically.

26. Both uneven-aged and even-aged management systems are allowed under the selected alternative of the FEIS. It is recognized that controlling the woody mid-story under uneven-aged management methods may be more difficult, especially through the use of prescribed fire. However, depending on the site and existing conditions, uneven-aged management may be an appropriate regeneration strategy. Please see response to comment #23 regarding affects to mast-dependent wildlife species.

27. Comment noted. The baseline volume figures used in the FEIS provide an accurate portrayal of actual timber volumes generated under the 1985 Wildlife Habitat Management Handbook direction for protecting and managing RCW Habitat and prior to Phase 1 and Phase 2 of the process to develop new Regional management direction for RCW recovery. Volumes predicted under a Forest Plan planning period are projected estimates that may not be realized due to changes in regulations, laws, management direction or on-the-ground conditions or interpretations.

28-30. Comments noted. The FEIS attempts to provide examples and information to the reader as to the likelihood, amount and extent of potential impacts incurred through implementation of the various alternatives presented.

31-33. Comments noted.

34. The Forest Service and the U.S. Fish and Wildlife Service agree that the translocation of RCW from one location to another is critical to the viability and eventual recovery of existing small populations. Translocation efforts currently taking place across the Region are very closely monitored to ensure that every effort is made to maximize the success of relocations and minimize the effects on the donor populations. It is recognized that the potential for mortality through stress or other factors exists. However, in the professional opinion of RCW biologist and research scientists, the benefits of this management tool exceed the risks that may be incurred during the process.

35. Please see response to comment #25.

36. Please see response to comment #5.

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The timber resource will be present in some mixture of age classes and species regardless of what management mistakes we make. However, failure to plan now for a future forest condition that can be maintained on a sustained-yield basis without large variations in the amount of desired ecosystem conditions (boom/bust management) will have devastating effects for the RCW. Simply put it is a "pay me now or pay me later" condition.

#### Specific Comments--

--On page x of the summary the plan to "limit regeneration of the oldest 1/3 of pine and pine-hardwood acres until they are within 10-20 years of rotation age" will surely jeopardize the RCW's existence on some forests. As discussed in the general comments section, this is an arbitrary decision with an ulterior motive and does nothing for assuring that there will be a sustained yield of old age classes for the benefit of the RCW. It most certainly will assure that all old age timber on some forests will be held as long as possible only to see a majority of the forest (or HMA) being placed in regeneration at the same time. This will cause a major loss of habitat for a number of years in which the RCW could possibly become extinct.

--I believe the HMA is the wrong approach to take for RCW management. The forest is capable of producing a maximum number of RCW's on a sustained-yield basis. Population objectives should be based on available habitat and not just the opposite. Arbitrary population objectives determined at Joe's Bar should be abandoned and the resulting new populations should result from good habitat management on the available acres ON A SUSTAINED YIELD BASIS. This DRIS may maximize RCW for a few decades in a best-case scenario, only to see these populations crash to levels much lower than present.

--MIL's are not worth the cost of monitoring--in my opinion.

--Whether you are discussing an individual tree or a stand of trees there is a maximum age to which the tree will grow before the tree becomes old and decadent and eventually dies. This is true whether even-aged management or uneven-aged management is used. Plans which do not consider this fact and try to "save" as much old timber as possible without considering the balance of age classes are only going to insure that all of the old stands become regeneration at relatively the same time.

--The leaving of seed trees in "irregular" shelterwood stands will work adversely to, and in conflict with, the objective of keeping the understory down out of the flight-path of birds. Seed trees drop seed almost every year and leaving a source of seed in these areas will assure that seedlings continue to develop and grow into the mid-story. Control with fire? We need to be realistic. It can't be done on two million acres with the present budgets, restrictions on burning days, manpower, etc. KV funds will also not be

37. Comment noted. Throughout much of the RCW's range, longleaf pine forests provided and continue to provide optimal habitat conditions for this species. Given this and the apparent inter-relationships between rotation lengths, prescribed fire frequencies, soil properties, insects and disease, and overstory species composition, longleaf pine (where it historically occurred) may be the species most compatible with the management strategy in all or portions of some HMAs. This determination, however, will be made at the Forest or site-specific level.

38. The foraging criteria for RCW incorporated into the FEIS were developed by the U.S. Fish and Wildlife Service in 1989. They are based upon three studies conducted on RCW populations in South Carolina. These criteria were developed to cover the entire range of the RCW. The FEIS encourages individual Forests to pursue studies in consultation with the U.S. Fish and Wildlife Service which may establish new foraging requirements for specific areas/populations.

Please see response to comment #5.

41. The guidelines for rotation and regulation in the FEIS do provide the general direction for forest management within the HMA. The formula presented on pages 169-170 allow additional flexibility for use in the HMA outside the sub-HMA or during pine restoration efforts. Regeneration under this formula is allowed during the first ten years of implementation. After that time period, the general direction for rotation and regulation as given would be used.

42. A population objective is based upon the amount of suitable RCW habitat within a HMA. It is considered to be the maximum density of active cluster sites in a HMA once the area is fully occupied. It facilitates monitoring and is useful in determining the health and viability of a particular population. Management Intensity Levels (MIL) are a risk classification strategy. Assignment of a MIL is based upon the RCW population size and trend over a period of time (at least five years). This strategy will provide added protection for those smaller populations at risk of extirpation while providing additional management flexibility to large, healthy populations. The sub-HMA concept also allows added management flexibility to large HMAs which currently have relatively small RCW populations.

43. As with any wildlife species, the breeding and nesting season is an extremely critical period for the RCW. Disturbance during this period can lead to nest abandonment or effect the reproductive success of a group. While it is recognized that many RCW groups maintain active cluster

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available, for the most part, as the proposal effectively stops the timber program, will cause below-cost sales, or will cause the logging costs to increase so dramatically that KV funds will not be available.

--The proposal to control the hardwood understorey for RCW is exactly what timber management foresters have been doing on some areas for years to produce pine stands on areas to be managed for pine. This work has always been a thorn in the side of wildlife biologists who wanted to "save" all the hardwood for the wildlife critters. Now the same thing is being proposed in the name of wildlife management to benefit the RCW. In this DBIS there is an attempt to make this action appear as if it is not detrimental to the other critters. It goes to show that it's not what you "do", but what you "say that you do".

#### --Chapter 2, Biological Diversity Issues

(1) What proof do you have that HMA's will make seedtree areas less desirable? This sounds to me as if you are simply trying to justify your decision. If it is true, however, and the seedtrees will be less desirable then why leave them at all. This is known as trying to have your cake and to eat it too.

(2) Prescribe burning which reduces the hardwood regeneration adjacent to streams and hardwood corridors (thus eventually the hardwood overstorey) has long been a concern of wildlife biologists. Just because burning is needed for RCW habitat does not mitigate this issue. This issue should be addressed and the impacts to all resources discussed to the fullest.

(3) In URAM there must always be an understorey or else the stand will be forced into HMA. You appear to be trying to justify the DBIS proposal for use of URAM, but still don't show how the proposed action will affect the most-dependent species.

(4) The baseline volume estimates shown are way too low. Is this an attempt to try to minimize the impacts of this proposal? In Mississippi, and many of the other forest plans, the volumes were very low at the beginning of the plan period and were supposed to increase to nearly double this amount by the end of the plan period. If you will use a baseline volume that will show what the volumes would have been without the RCW you will see that the truth is not being shown in these figures.

(5) The answer is YES. If you will just give us the facts in plain and simple language and not try to slant, bias, or conceal the facts in the verbiage simply to justify a foregone conclusion (That is, this proposal will be approved), it will, at least, be honest.

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sites in or near areas of high human activity, the conservative biological approach is to minimize to the greatest extent possible any new or added disturbance during this time.

44. Prescribed fire within a HMA will be essential to controlling the woody midstory. Because of existing conditions, there will be cases where repeated fire will not result in the desired midstory condition. In these instances, the preferred alternative provides the forest manager with a variety of mechanical, manual or chemical methods to achieve the desired condition.

45. As stated earlier, sustaining habitat for the future is essential to the viability and recovery of the RCW. The preferred alternative provides for regeneration under specified rotation lengths, depending on the pine species. The amount of regeneration allowed determines the percentages in each of the age classes. Some additional restrictions are imposed to protect future nesting habitat and existing foraging habitat and to prevent fragmentation and isolation of existing cluster sites, recruitment stands and foraging habitat. Opportunities for regeneration are expected to continue.

46. In the pine restoration strategy described in the preferred alternative, the emphasis is on restoring desirable pine species to those sites that they historically occupied. In this scenario then, Management type for those sites is the species which occurred historically and is expected to meet the needs of the RCW.

47. Again, in the pine restoration strategy, emphasis is on restoring the desirable pine species. So where those desirable species already exist, they will be protected from even-age regeneration until they reach rotation age. This does not preclude regeneration on those areas occupied by "off-site" species and thus allows the forest manager to work towards a balanced age class distribution. A balanced age class distribution may not be achieved in the first cycle. Those HMAs not incorporating the restoration strategy would not be held to this restriction.

48. Please see responses to comment #2 and comments 12-16.

49. The table you refer to provides rotation lengths by pine species. The percentage given in the right-hand column is the amount that would occur in each age class once a balanced age class distribution is achieved.

50. Monitoring will be required to evaluate the efficacy of forest management projects which implement the final RCW direction. It is essential to measure effects on RCW



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(6) Again, please avoid the bias. I can determine what is, and what is not, a "small percent". An accurate statement would be simply to state that "between 124,500 and 156,700 acres will be prohibited from minerals exploration for alternative 2". This is an area one mile wide and approximately 200 miles long.

(7) This appears to be biased with an attempt to downplay the adverse effects of this proposal. How do you know that this is not likely? Is this someone's opinion? It may vary will be vary likely.

--On alternatives considered but eliminated--

--1. Preservation - It would also violate the law.

--2. Expense doesn't appear to be a consideration in this DEIS on what is "wanted". It's shocking to see it used as an excuse here.

--3. Total UZAM will not recover the RCW. Neither will the proposed

action; However total UZAM will not cause extinction of the RCW. I'm not so sure about the DEIS proposal.

--Page 49, translocation. How do we determine that we are not infecting the new population with a diseased bird, or that we are putting a healthy bird into a diseased colony? After all, the populations are decreasing in many instances and this may not be due to habitat. There are more houses now than there are birds.

--P.Burning - Using "natural" firebreaks will assure that the pure hardwood stands will be reduced by a gradual killing of hardwood reproduction. If we have learned one thing from fifty years of management of the National Forests we have learned that fire and hardwood don't mix. Again, the truth has escaped the moment in an attempt to justify our proposed actions...

With exotic species present in the understory of many existing stands fire being "critical" to RCW management takes on another meaning. Continued burning can cause kudzu, and other species, to completely take over an area. In time, even the pine overstory may be overtaken and lost entirely. There are at least 5000 acres of this condition on the NP's in MS. The entire Yalobusha unit of Tombigbee NP is threatened by kudzu, and much of the Trace and Ackerman units of the Tombigbee District, and much of the Holly Springs NP may lose huge acreages to kudzu in the next few years. This condition exists on many other units in R-8.

--Historically, most of the lands occupied by longleaf pine and the RCW were underwater. There have been many changes in the cover vegetation since that time. We, as land managers, have the audacity to suggest that we know what species is best suited to the site based on a short, 100-200 year history. Nature is always changing. How do we know that sites which have changed to other species should be converted back to longleaf is "best"?

habitat and on RCW populations in order to make adjustments in management practices and activities when necessary.

51. The literature indicates that while thinning in pine stands will not prevent or eliminate Southern Pine Beetle (SPB) infestations, it may help to minimize the impacts to a pine stand from SPB infestations by maintaining or improving tree vigor and tree spacing.

52. Please see response to comment #7.

53. Comment noted. Please see response to comments #12-16.

54. Comment noted. While the act of removing or reducing the hardwood midstory from a cluster site or recruitment stand is not expected to have a direct effect (cause mortality) on a RCW, the indirect effects of improving the overall habitat quality of these areas will benefit the RCW.

55. In many instances, the lack of potential cavity trees and existing cavities is recognized as a limiting factor in maintaining and improving the viability of RCW populations. The time and energy required to excavate a new cavity can be significant. Cavity restrictors are one of the tools needed to provide sufficient suitable cavities. As the FEIS states, intensive monitoring will be required to minimize any adverse effects the placement of these restrictors may have on an RCW group.

56. Please see response to comment #34.

57. Comment noted.

58. Please see responses to comments #6, #17, #18, and #45.

59. Comment noted. The last portion of the statement you refer to is meant to indicate that those stands which are less than 30 years old will be scattered throughout the forest. It does not imply a 30 year rotation.

60. Comment noted. The FEIS recognizes that irregular shelterwood is an untested regeneration method for loblolly, shortleaf and slash pine. It also states that it is uncertain whether or not this method will supply a steady flow of RCW habitat. Depending on the site, very high densities of seedlings may occur under this silvicultural method. Various techniques are available for reducing these high densities; but in some cases they may not achieve the desired levels or may be cost prohibitive. This like all other activities prescribed in the final RCW management direction will have to be monitored to determine their efficacy towards producing the desired vegetation results.



38 --Page 50. Foraging Habitat - These figures should be based on sound, scientific, evidence and not just someone's opinion. I don't believe them for one minute. Provision should be made to revise them as they are proven incorrect by new studies.

39 --Page 53. Thinning - When exotic species are present the existing stands must be managed differently to prevent the entire stand from being overcome by the competing species. This may mean that the stand cannot be prescribe burned, thinned, or regenerated in the traditional manner. It also will probably mean that UEAM cannot be used in the areas affected.

40 --Alternative B

-- Need to take a very close look at the plans for thinning and the use of fire where exotic species are present.

41 --HMA's are a single-use concept in a multiple-use forest. They are not needed to manage for maximum benefit for the woodpecker. The HMA concept should be dropped entirely. The RCW doesn't know when it enters wilderness areas, or suitable forest land; neither does it know when it is on NF land or on private land. We need to simply manage the total area on a sustained-yield basis with a rotation age that will maximize RCW habitat. If you follow the guidelines on page 55 and 56+ without using all of the unnecessary, confusing, and complicated formulas, management for the RCW recovery could be a really rewarding and fulfilling endeavor.

42 --Setting population objectives is unnecessary-- Simply furnish the habitat, control predators, and get out of the way. There is no need for but one management intensity level, and that is for the RCW recovery and maintenance. You are going to great extremes to make a simple process extremely complicated and un-workable. Neither do you need sub-habitat management areas. Really, who do you think you're kidding?

43 --Meeting season disturbance and right-of-way construction restrictions could not possibly be based on biological need or scientific research. I have observed RCW colonies in extremely high traffic areas for at least 20 years. One such area is still active following construction of a 4-lane highway and weekly cattle sales under the canopy. What are the ulterior motives for the plan? Management does not need to be based on someone's biased opinion.

44 --Page 176 - "Prescribed burning is the best way to control mid-story vegetation". It sure is if you want to control the overstory too. The typical mid-story of an immature sawtimber stand will be of pine and hardwood trees much too large to control with fire. Only the understory may be controlled with fire if one wishes to preserve the overstory. Mid-story will have to be controlled with hand tools such as chainsaws, mechanical cutters, or by the use of chemical herbicides.

61. The preferred alternative would require leaving 25-30 or 40 square feet of basal area until the longleaf seedlings are well established, and then reduce the overstory to six trees per acre. However, the longleaf reserve trees should be clumped to enhance growth of the new stand and to provide the potential for new clusters.

62. Please see responses to comments #6, #17, #18, and #45.

63. Please see responses to comments #5 and #51.

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(33)  
--I see all the rhetoric about age class distribution, but I don't see any histograms that will show what the age classes will look like on each forest, by decade, at 10-200 years. Instead, the reader is inundated with complicated formulas that limit the amount of regeneration. There seems to be an obsession limiting the amount and size of regeneration that can take place now instead of making plans to get the age classes of each forest distributed in a manner which will provide for the RCW needs.

46  
--I do not agree that Management type describes which species would have historically occupied the site. Management type describes, to the best of our ability, which species will best meet management needs. Put simply, there is no cotton soil, or corn soil, but there are soils on which each of these plants will grow better than on others.

47  
When an arbitrary restriction is put on when a longleaf stand can be regenerated (last paragraph - page 179) without also taking into consideration and making plans to balance the age classes of the entire forest your entire argument for age class distribution is null. Too many times we say one thing on the surface, but put in other restrictions which have the effect of nullifying the original plan under the surface. I believe this is one of the major problems in this DEIS and it is one of the reasons that I find the proposal un-workable.

48  
--Page 183, Regeneration and Sustaining the RCW - Although biological evaluation and environmental assessments are planned for the RCW habitat, there should be a thorough discussion of the impacts of each of the planned RCW activities on each of these species. What are the effects of burning on the Gopher tortoise? How does this effect regeneration and growth of the species? What effect does thinning or not thinning have on each of the other species? What are the effects of using pesticides? How will opening up stands or converting to other species effect TAG plant species (effects on each species on each forest, on each HMA).

49  
--Table 2-27 is an example of other restrictions that will prevent balancing the age classes in this DEIS, and is another example of why this proposal is un-workable. Example; in a HMA which is 100 percent 120 year old longleaf pine, using these guidelines it will take 120 years to regenerate all of the area. What will probably take place is that some percent less than 8.3 will be regenerated during the first decade, and perhaps the same percent may be regenerated within the succeeding (one or two) decades. Then the stand will have reached an age to where the remaining 70-80 percent will become decadent and die over a period of 10-20 years. When this happens we have put the RCW in jeopardy because of a total loss of habitat. We will then have all of the area in a 0-40 or 50 year age class with the majority of the area in the younger age classes.

133

You may find fault with my example using all 120 year old material, and this is on the extreme end of the scale, but remember, the majority of the timber in the Southeast was established following an almost total clearcutting of the area from 1900 to 1920. Most of the timber present now is in an unbalanced age condition and if we simply put on blinders and ignore this basic fact we are sealing the fate of the RCW when the "crash" comes in a few decades.

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--Monitoring - A way to spend taxpayers money. On paper it looks impressive, but it doesn't do a thing to improve the habitat or to protect the bird. An overly complicated plan requires an overly complicated monitoring system. All the monitoring needed is to monitor how the habitat work is coming along and to see that the age classes are being balanced as needed. This DEIS is what I would describe as a transit and pacing survey. Too many basic facts are simply being ignored or overlooked because of an obsession to control timber harvesting now.

51

--Page 195, Thinning for Southern Pine Beetle Hazard Reduction - This treatment may be in direct conflict with what is needed to control exotic species. Thinning will help in the younger stands, but nothing will help very much as the stand ages. This is another of nature's ways to regenerate stands when they have reached ecological maturity. We may force some of these stands to live a little longer with some of our efforts, but in the long run, they will succumb to the violence of nature. We can only regulate "how much", not when; we can't even regulate "how much" if we allow all of the area to become old at the same time.

52

--Page 201, Alternatives C-2 - Change "Establishing BMA's in these alternatives would allow an ecosystem approach" to "Establishing BMA's in these alternatives would allow a single use approach". The truth folks, only the truth.

53

--What are the cumulative effects on all of the other resources other than the RCW? There are negative effects on management of the timber program, negative effects on soil and water, negative effects on other wildlife species (especially those using hard mast). This section needs a lot of work to show all of the cumulative effects on all resources including other T&E species, flora, fauna, fish, and the cumulative social effects on forest users.

54

--Page 202, mid-story removal - If there will be no direct effect to the RCW then why is the mid-story being removed at all? Isn't this the intent of the removal of mid-story? Adverse effects to RCW could be that cavity trees may be killed. I've seen it happen more than once where wildlife biologists who were not trained in the proper use of herbicides applied

soil active chemicals and killed some of the cavity trees. In addition, I have seen the removal treatments cause infestations by Southern Pine Beetles which eventually killed some of the cavity trees. Please address the adverse effects of the things that you want to do in the proposal in addition to the adverse effects of what you don't want to do.

--Page 203, cavity restrictors - You are probably aware that at least one RCW was killed when it became entangled in a cavity restrictor. This appears to be an adverse effect to me. Also, disturbance during the installation procedure which is up on the tree at the cavity entrance appears to be much more destructive than simply driving a vehicle past the tree at some point in time. As stated before, the writing of this document is very biased to support what is planned, and to "play down" the adverse effects of what you plan to do. It seems a nice thing to say, but what proof do you have that cavity restrictors will allow the RCW to "spend more energy on nesting, brood rearing, and foraging". All they have is time. Are we to expect an extra egg per nest, extra hatchlings each year, or perhaps faster hatchlings? What proof is there to this statement, or is this someone's opinion?

--Page 203, translocation - How do you know whether there have been deaths caused by the translocations? We don't know what happened to many of the birds after they were moved. We could consider that all of these unknowns are deaths. They are not where they were and they are not where they were placed. Your statement "assuming the translocation is successful" discusses all of the good points (things you wish to do). Now discuss the effects "assuming the translocations are not successful" as some of them will surely be. Will the FS be guilty of taking an endangered species and subject to fine? Why not? I can't believe what you are saying here "if monitoring efforts indicate a loss of active clusters or reduced reproductive outputs in donor populations, augmentation efforts would be scaled back so adverse cumulative effects do not occur to donor populations". We are willing to kill a number of endangered birds to try something that seems good and may work. I believe that any idea such as this which has a built in mortality factor for endangered species should be stopped. I believe administrators will be negligent in their duties to let the program continue and should be held accountable for their actions in the courts.

--Page 206 - The statement "Even-aged stands will normally grow into foraging size in fewer years than two-aged or uneven-aged stands" is somewhat misleading. While this is probably true in most instances for two-aged stands, a comparison is difficult in uneven-aged stands, especially those being managed by single tree selection. In these stands larger trees should always be available regardless of how long it takes to grow them to the needed size.



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--Page 207, The assumption of balanced age classes is far from realistic with the proposed DEIS. Also, there will be catastrophic events, and many of them, during the planned period and in the future. All of the RCW habitat is subject to damage from hurricanes and tornados. Most of the areas can expect to be hit by at least one major hurricane within the next 50 years. It's anyone's guess how many tornados, wildfires, and damage by Southern Pine Beetle, will take place during this time. The damage will be significant and hurricane Hugo will not be the exception to the rule.

59  
--Page 212, Even-aged Silviculture - What is meant by the statement that "A forest with balanced even-aged stands managed using the clearcut, seed-tree, and shelterwood methods would have stand size areas (10+ acres) of potential cavity trees, foraging habitat, and 0-30 year age classes scattered over the forest". Are you assuming a 30 year rotation?

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--Two-aged Silviculture - The effect of leaving seed trees on a site for an indefinite period will have a significant influence on the type and amount of understory and mid-story that will develop in the area. I have seen seed tree areas which contained as high as 50,000 to 75,000 seedlings per acre after the seed trees were left on the area for only two or three years. Some of these stands were pre-commercially thinned at age 3-5 with choppers, rotary cutters, and shearing blades at a cost of approximately \$80 - 100 per acre. The stems remaining in the rows were still so thick that additional hand work is needed at an additional cost of \$100+ per acre. When thinning is done too early (before the seed source is removed, and sometimes afterwards) seedlings will become reestablished between the rows of trees and the area may need additional thinning treatment.

Planning to leave loblolly seed trees for extended periods will cause significant thinning problems on forests such as the Bienville NF in Mississippi. The end result will be that the mid-story will consist of an extremely dense growth that cannot be controlled on many acres (money and manpower will not be available). As this young regeneration grows into pulpwood size material it will make the seedtrees useless for RCW use as the mid-story will be as dense as one could imagine.

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In longleaf pine, studies have shown that leaving only a small basal area in the overstory will have a significant impact on the seedling mortality and growth. As low as 5 square feet of basal area left on the area will cause a loss of approximately 25% of the reproduction. A study by Bill Boyer shows that as the leave basal area increases the amount of regeneration present up to 30 years decreases. I don't believe it would be wise to leave longleaf seedtrees for extended periods if the intent is to develop and maintain longleaf regeneration.

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--Page 217, Direct effects of fragmentation control - I still believe that you are overlooking the devastating effects that fragmentation control will have on the RCW after it has "recovered" in the short term and when the "crash" of available habitat comes. The efforts being placed now to "save" old growth, and to prevent habitat fragmentation, will have a "pay me later" price tag. This price will be a severe loss in RCW habitat in a few decades because we did not make every effort to balance the age classes now while we still have time.

62

--Southern Pine Beetle Hazard Reduction - Probably the single most effective method of controlling SPB is to keep the rotations short. This is followed by putting the proper species on the site, and keeping the stands properly thinned. However, short rotations are in direct conflict with RCW management. By the same token, thinning may be just as much in conflict with exotic species management. Folks, this is a severe problem that is just before causing some devastating effects on forests in the South.

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I had difficulty in obtaining a copy of this document to review. Will you please put me on the mailing list to receive all additional materials and correspondence relating to this issue?

Thank you,

*Robert M. Taylor Jr.*  
Robert M. Taylor Jr.



RCW  
3/4/94  
jms

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Via Certified Mail  
Return Receipt Requested

February 28, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Road, NW  
Room 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

The following are my comments and recommendations regarding the DEIS for Management of the RCW and its Habitat on National Forests in the Southern Region. My comments have been structured in a manner that should be useful in assisting responsible parties and the public in making this decision.

#### COMMENTS

1. Uneven-aged silviculture and even-aged "modified group selection" silviculture with longleaf and other southern yellow pines has never been tested operationally on the scale proposed. From my personal experience, there is at best a 70% success rate in attempting to obtain adequate natural pine regeneration. The logistics and cost of your proposed methods are even more in question due to the following:
  - a. large areas of prescribed burning, especially summer burns, are proposed. Points of question include human health and safety, smoke management, and cost and efficiency.
  - b. regeneration areas would be small, scattered and intermingled with other stand conditions. Protection and health of regeneration from wildfire, prescribed fire, and other disturbances (including harvesting) is questionable.
  - c. harvesting would be grossly inefficient to administer and carry out on a competitive basis, calling into question your economic projections.
2. The lack of substantiating data makes projected yields (Table S-3), employment (Table S-4), income (Table S-5) and payments to counties (Table S-6) extremely questionable.

Response to Comments in Letter No. 34

From: John Helms

Comment No.	Response
1. Please see Response #143, Comment #5 and #6 and Response #33, Comment #60.	
2. Comment noted.	
3. Comment noted.	
4. Each National Forest will develop current projections when they amend or revise the Forest Land and Resource Management Plan to incorporate this plan.	
5. Figures have been changed to base all comparisons on 1994 dollar amounts.	
7. As mentioned in #4 above, each Forest will examine these issues again in greater detail. Appendix F shows projected effects by National Forest based on regional averages.	
8. Comment noted.	
9. Comment noted.	
10. Comment noted.	
11. See Response #100, Comment #1.	
12. Opportunities for input are still available at the Forest and Ranger District as they develop their specific plans to implement this plan. See also Response #113, Comment #2.	
13. See #12 above and Appendix F.	

Mr. Dabney  
February 28, 1994  
Page 2

3. Data in Tables S-5 and S-6 are misleading due to the way they are presented. In both tables, the "Baseline" columns are in 1988-89 dollars and are shown as a constant figure over a 30-year period. By contrast, values generated by the "alternatives" are expressed based on higher prices attained during 1992-1993. For an accurate comparison, dollars associated with the "baseline" and the "alternatives" should be expressed in the same constant dollars.

4a. Another confusing and questionable aspect of the aforementioned tables is the expression of pulpwood and sawtimber yields and prices in thousand board feet. For purposes of the DEIS and public scrutiny, pulpwood and sawtimber volumes and values should be based on units of cubic feet and thousand board feet (Scribner Rule), respectively.

b. All of the aforementioned tables should be provided for each of the affected National Forests and Ranger Districts in an Appendix, because local impacts vary.

5. The "authorities" (i.e., "Scientific Summit on the RCW," Appendix G) who apparently crafted most of the underlying assumptions of this plan are primarily government employees, primarily wildlife biologists, and are not trained or experienced in forest management or silviculture. Furthermore, a symposium sponsored by a non-governmental organization should not suffice as the primary basis for this significant proposed amendment to National Forest Plans in the South, as this process was almost entirely lacking in review from other resource professionals, peers outside of the group assembled, and the public.

6a. The Forest Service is required by law to assist in recovery of endangered species, and in consultation with the U. S. Fish and Wildlife Service, has decided "to develop new regional management direction for recovery of the species" (p. xxxii). The EIS contends that not implementing the proposed action would result in "jeopardy to the species." A group of "experts" concluded that to be considered part of the "same population," RCW clusters should be less than 18 miles apart (p. xxxv), provided they are linked by suitable foraging habitat (p. 355). If linked by unsuitable foraging habitat, they can only be five miles apart (p. 355).

The 1985 revision of the RCW recovery plan "identified 15 RCW recovery populations needed to conserve the species. "Twelve... are totally or in part dependent on National Forest System land" (page xxxi and page 355). The RCW Recovery Plan calls for populations of 250 groups (alleged to mean "reproducing" pairs although not specified in the plan) (page 357). Research shows that on an area not managed for the quality of habitat proposed for National Forest lands (i.e., "sandhills of North Carolina"), 391 RCW groups are providing 250 breeding pairs (p. 367).

(34)

On Hitchiti/Piedmont refuge in Georgia only 300 groups were providing 250 breeding pairs (p.367). The basis for using 500 groups in a very well managed habitat such as the one proposed is not substantiated and is based on overly conservative, subjective assumptions made during the "RCW Summit" (which is not part of the RCW Recovery Plan). The Reproducing Population size equivalents shown in Table A-2 (p. 367) are likewise unsubstantiated and overly conservative, except perhaps at lower population levels (e.g., 50).

- b. The proposed action is to establish 9,300 active cluster on 26 National Forests or individual Ranger Districts therein (Table S-1, p. xi). If we assume that 500 clusters will provide a recovered population, the proposed action should provide 18.6 recovery populations. Instead, it provides only four recovery populations (specified in the recovery Plan) of 500 or more clusters. It provides only seven recovery populations of over 400 clusters (if you include the combined improvement of the Oconee N.F. and the Piedmont/Hitchiti Refuge), and nine containing over 300 clusters. At the same time, however, the plan proposes to create one recovered population on a site not identified in the recovery plan (and in close proximity to another N.F. recovery site that will be "recovered") and eight non-recovery populations of over 200 clusters. In several cases where there are now only 1, 5, or less than 40 current clusters on sites not identified as part of the recovery plan, sixty, twenty and ten-fold increases in current populations are proposed. It is difficult to understand how this activity can contribute to recovery, or how not undertaking the proposed activities on these sites could place the species in jeopardy. To make matters worse, the proposed action would cause relatively greater amounts of resources to be devoted to these areas contributing limited results.

With these facts in mind, one can only conclude that tax dollars and resources are not being used efficiently. Also there appears to be either a "hidden agenda" or an implied goal to increase RCW populations well beyond the recovery goals, that is not revealed in the EIS, in violation of NEPA. The EIS should reveal all conversations or plans involving RCWs on other federal and non-federal lands near or adjacent to National Forests that have occurred during the RCW Summit, consultations with U. S. Fish and Wildlife Service, and other activities associated with the preparation of the proposed action and the EIS. Without such full disclosure, the full range of environmental and economic impacts of the proposed plan cannot be assessed.

Mr. Dabney  
February 28, 1994  
Page 4

7. For purposes of the EIS, recovery of the RCW should be fully distinguished from a policy direction to implement "ecosystem management" on National Forest lands. There is little or no biological data to substantiate proposed RCW management on the entire proposed landscape. The proposed action is basically single species management and circumvents the planning, public input, and multiple use requirements of NFMA and other legislation. The EIS alleges to provide "flexibility," but provides little or none that I can determine. Every major detail and guideline is essentially "spelled out."

13 RECOMMENDATIONS

1. Revise and improve economic evaluations as explained in my comments 1 through 5.
2. Provide cost data as well as income data, at Ranger District or Forest level.
3. Allow more clear cutting and artificial regeneration than proposed in HMAAS and other management units, provided that populations are stable or increasing.
4. Reveal all proposed recovery strategies, including the combined roles of National Forests, other federal, and non-federal lands.
5. Assess the proposed goals for each individual Ranger District (or other management unit) based on cost, the significance of the unit to recovery, and the role each unit plays in conjunction with local recovery strategies (see #4 above).
6. Involve a broader segment of resource professionals and the public, especially local people impacted by the decision, to play a greater role in determining management direction and ultimate RCW population goals on individual administrative units.

Yours truly,

*John R. Helms*  
John R. Helms  
549 Westlawn Road  
Columbia, SC 29210  
SC Registered Forester No. 850

*Rec Lcw 3/7/94 (35)*

P.O. Box 328  
Benton, Ms.  
March 3, 1994

The Clarion-Ledger  
Letters to the Editor  
311 E. Pearl  
Jackson, Ms. 39225

Dear sir:

I read with interest the remarks by Mr. Gene A. Sirmon regarding the red-cockaded woodpecker and the Forest Service's plan to set aside habitat for the species. I suspect Mr. Sirmon of feathering his own nest with his opposition to proposal for management of National Forest acreage.

The Bienville, De Soto and Homochitto Forests have been extensively logged in the past so that it could take the proposed ten to thirty years for many areas to regenerate marketable timber. As a timber grower myself, I have had dealings with a number of timber companies in Mississippi who are negligent and indifferent to environmental concerns in their practices, all but ignoring Federal guidelines for desirable harvesting procedures which help protect the integrity of our forests and streams. Mississippi, itself, has very little regulation over how timber interests conduct themselves, with fewer environmental laws on the books than most of the states in the Union.

With the rate of private timber sales accelerating because of soaring timber prices, it would be heartening to see some of our public lands set aside as habitat. The practise of clear-cutting does little to promote the well being of other wildlife species mentioned by Mr. Sirmon. I would sooner trust the Forest Service to protect habitat than the timber interests Mr. Sirmon represents!

Very truly yours,  
*B.A.W. Byrd*  
B.A.W. Byrd

CC: RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road N.W.  
Atlanta, Ga. 30367

Response to Comments in Letter No. 35

From: Barbara Ann Byrd

Comment No.                      Response

1.    Comment noted.



PHILLIP J. SHEPHERD  
SECRETARY



BRERETON C. JONES  
GOVERNOR

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET  
DEPARTMENT FOR NATURAL RESOURCES

DIVISION OF FORESTRY  
MARK MATUSZEWSKI, DIRECTOR  
627 COMANCHE TRAIL  
FRANKFORT, KENTUCKY 40601

March 4, 1994

Marvin C. Meier  
Acting Regional Forester  
USDA Forest Service  
1720 Peachtree Road, NW  
Atlanta, Georgia 30367

Dear Mr. Meier:

The Division of Forestry has reviewed the Draft Environmental Impact Statement for Red-cocked Woodpecker, and supports the Forest Service in the selection of Alternative E. This would affect some 20,000 acres of the Daniel Boone National Forest in Kentucky. Alternative E appears to provide much additional detail and a more systematic approach to RCW management than what is currently being done. It also calls for putting this approach into effect immediately rather than waiting for the total process to conclude; therefore, we support Alternative E.

Sincerely,

*Mark*  
Mark Matuszewski  
Director

MM:WCP:pf

Response to Comments in Letter No. 35.1

From: Mark Matuszewski

Natural Resources and Environmental Protection Cabinet  
Department for Natural Resources, Div. of Forestry  
Commonwealth of Kentucky

Comment No.                      Response

1.                      Comment noted.



(36) Received  
RCW 3/19/94  
3703 Fallen Timber  
Jonesville, Ky 40241  
March 7, 1994

Mr. Joseph Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road NW  
Room 718 N  
Atlanta, Ga. 30367

Dear Mr. Dabney,  
Thank you for helping to save  
the red-cockaded woodpecker.  
Please use the ideas of Forest  
Service biologist Larry Mantoglio  
who is advocating saving the  
ecosystem that the birds in-  
habit. He feels that it

Response to Comments in Letter No. 36

From: Candace McBride

Comment No.

Response

1. Habitat Management Areas will be established by the Forest Service in an area that is suitable for RCW management, contains sufficient habitat to meet population objectives and contributes to the recovery of the RCW. The selected alternative establishes that HMA's be able to support at least 50 active RCW groups.

could require 70,000 acres or more in the Kentucky areas of London, Stearns and Somerset ranges. districts, I) we continue to give in to the Logging interests, our precious forests will disappear and be replaced with man-made tree farms. Our environment has suffered enough.

I feel that preserving the ecosystem, no matter how many acres it may take, is the answer.

Thank you, Sincerely,  
Candace W. Brade  
(Mrs. John F. W. Brade Jr.)

# Conway Pole & Piling Co., Inc.

March 9, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W., Room 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

As a citizen of Mississippi I am very concerned about the management of our National Forests. I also strongly support the U. S. Forest Service in it's efforts to manage and protect the Red Cockaded Woodpecker.

The RCW EIS as written however, is totally unacceptable in that the recovery goals are far too extravagant and habitat management measures required in the plan are far in excess of that necessary to recover the bird.

I will accept Alternative E only with the following changes:

- (1) The recovery populations objective for the Bienville should be decreased to 300 to 350 colonies.
- (2) Rotations must be reduced to 70 years for loblolly and 80 for longleaf and used in combination with artificial cavities and designation of small recruitment stands. These rotations and recruitment stands will result in a perpetual supply of suitable habitat and the use of artificial cavities will serve as insurance in expanding the population.
- (3) Eliminate all lands from foraging habitat except that needed for the current population plus that necessary to accommodate the expected population increase for the next 10 years. Normal forest practices, including 70-80 year rotations, should be conducted on the lands eliminated except recruitment and replacement stands would be designated and all relic trees retained. This process would be re-evaluated after 10 years to determine the need for additional foraging habitat.
- (4) Reduce minimum age of acceptable foraging habitat to 20 year old pine and pine hardwood stands. Also, recognize agriculture fields, pine plantations under 20 years old, utility rights-of-way, etc., as supplemental foraging habitat. Supplemental habitat should be recognized on a 2 for 1 ratio to regular habitat. (Two acres of supplemental habitat would be substituted for each acre of regular habitat). This will effectively reduce the acres of older stands needed for foraging.
- (5) Drop all references to the modified shelterwood system of forest management and instead use normal silvicultural practices to manage the bird. This was done, with very few modifications, during the growth of the only two successful populations in the south i.e., South Carolina and Florida.
- (6) Accurately disclose the sawtimber and roundwood volume that will be withheld as result of the implementation of this plan.
- (7) Alternative E must be revised to exclude translocation of any colonies with 3/4 miles of private lands.
- (8) Alternative E must be revised to exclude the Chickasawhay District as a recovery unit.

I appreciate the opportunity to comment on the plan and respectfully request that you consider these suggestions when making the final decision

Sincerely,

CONWAY POLE & PILING CO., INC.

*Kenneth Conway*  
Kenneth Conway, Vice-President

Response to Comments in Letter No. 37 (and others)

From: Form letter received from 114 contributors numbered as follows: #38-41, #43, #45-52, #54-64, #66-69, #71-81, #84-88, #91-97, #102-108, #120-132, #146, #151-158, #174-176, 207-208

Comment No. Response

1. The U.S. Fish and Wildlife Service Red-cockaded Woodpecker (RCW) Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. One of the areas identified to meet this RCW Recovery Plan objective is the Bienville National Forest in Mississippi. In the absence of population-specific reproductive data, 500 active clusters will be needed to provide the required minimum of 250 reproducing RCW groups necessary to maintain long-term viability. Thus the Bienville has been given a population goal of 500 active clusters. Population monitoring in the future will determine the actual number of active cluster sites needed to provide the minimum of 250 breeding pairs on a sustained basis.
2. Rotation periods have been extended for suitable pine species to enable RCW populations to sustain themselves without the use of artificial cavities or translocation. Recent studies have indicated a need to extend pine rotation periods to provide sufficient heartwood diameter at cavity level. The extended rotation lengths established in the selected alternative will not only provide the necessary heartwood but also increase the incidence of red heart crucial to cavity excavation.  
  
The use of artificial cavities is intended to be a short-term measure needed to get RCW populations beyond the limited number of naturally occurring suitable cavity trees. Artificial cavities are costly and require recurring maintenance to maintain their usefulness to the RCW.
3. The USDI-Fish and Wildlife Service requires that the minimum foraging equivalents be provided to all RCW cluster sites and recruitment stands. The selected alternative makes some specific allowances for when these equivalents need not be maintained. One such allowance requires providing 50% of these equivalents to recruitment stands which are located more than 1.5 miles from an active cluster. This reduction in foraging equivalents is allowed only when the objective of the regeneration harvest is pine restoration.

4. The foraging criteria for RCW incorporated into the FEIS were developed by the U.S. Fish and Wildlife Service in 1989. They are based upon three studies conducted on RCW populations in South Carolina. These criteria were developed to cover the entire range of the RCW. They stipulate which forest types are considered suitable for foraging, what age these stands must be to provide suitable foraging substrate, how much foraging substrate must be provided and where it is to be located in relation to the cluster site or recruitment stand. The selected alternative encourages individual Forests to pursue studies in consultation with the U.S. Fish and Wildlife Service which may establish new foraging requirements for specific areas/populations.
5. Please see Letter #33, Comment #60.
6. Table 3-12 in Chapter 3 of the FEIS provides relative comparisons between alternatives of the sawtimber and pulpwood volumes estimated over a three decade period. The timber volumes displayed are not commitments and only take into account the effects of RCW management. Appendix F of the FEIS was added to provide the same information for the individual Forests. Actual timber volume projections for a particular National Forest will be determined through the Forest Land and Resource Management Plan and will take into account RCW management as well as other issues, standards and guidelines and budgets.
7. Comment noted. The placement of artificial cavities and the translocation of RCWs will be determined by the proximity to existing RCW groups, the availability of existing foraging habitat, and other site-specific situations. The distance to private land would be an issue which may best be addressed at the local level during the public involvement process at the project implementation stage.
8. The U.S. Fish and Wildlife Service Red-cockaded Woodpecker (RCW) Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. One of the areas identified to meet this RCW Recovery Plan objective is within the DeSoto National Forest in Mississippi. The Chickasawhay Ranger District was identified as the best opportunity within the forest to achieve recovered population status.

(114)

3-10-94

Dear Mr. Dabney,

Thank you for accepting comments on the management of the red-cockaded woodpecker. My family is all in agreement, please do all you can to protect the few remaining birds of this species.

I have always spoken out against the Forest Service's practice of clear cutting. I wish this service would protect our forests instead of selling them.

Sincerely,  
Mark F. Huns

Response to Comments in Letter No. 44

From: Marta Hinson

Comment No.

Response

1. Clearcutting is allowed in Habitat Management Areas (HMAs) if a site specific evaluation determines that there will be long-term benefits on RCW. Certain requirements and limitations must be met before clearcutting can occur.



Jeff Keady  
23 Roxi Street  
Brandon MS 39042

Thu 10 Mar 94

Mr Joe Dabney  
1720 Peachtree NW 71BN  
Atlanta GA 30367

Dear Mr. Dabney:

I'm a native Mississippian residing one county over from the western boundary of Bienville National Forest and am concerned with the US Forest Service's management strategies concerning the controversial Red Cockaded Woodpecker.

I've spent much time around Bienville over the past six years and have been impressed with the level of forest management and the quality of timberland. However, I believe the current Red Cockaded Woodpecker Environmental Impact Statement sets excessively high standards for recovery of the RCW.

Alternative E would be a good approach to the recovery, although I would submit a few alterations, such as pulling the loblolly pine rotation age down to 70 and longleaf down to 80 and throwing in some artificial nesting cavities to help support the RCW population. Also, knocking down the recovery population target in Bienville to 300-350 colonies.

Also, make known the volume of timber that would be off limits if this plan is enacted, eg. board feet of sawlogs, tons or cords of pulpwood, etc., so that we'd know the wood harvest tradeoff for RCW habitat management. In addition, consider excluding the Chickasawhay District as a recovery unit because its RCW population has been virtually nil for the longest and it would be nothing but a straight uphill battle to try to establish RCW colonies. Instead, concentrate more on Bienville since that's where most of the birds are to begin with.

I appreciate the opportunity to comment on the RCW EIS and hope that you'll keep in mind some of these suggestions when coming up with the final draft. Thanks.

Sincerely,

*Jeff Keady*

Jeff Keady

Response to Comments in Letter No. 53

From: Jeff Keady

Comment No.

Response

1. See comment letter 37.



Response to Comments in Letter No. 65

From: David Lang

Comment No. \_\_\_\_\_ Response \_\_\_\_\_

1. See comment letter 37.

Rec. RCW

3/14/73

(65)

David Lang  
1045 Halton Court  
Brandon, MS 39042  
March 11, 1974

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W., Room 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

As a U.S. citizen I am very concerned about the management of our National Forests, and to a certain degree I support the U.S. Forest Service in its efforts to manage and protect the Red Cockaded Woodpecker.

However, I cannot accept the RCW EIS as written. I will accept Alternative E only with the following changes:

- (1) Reduce rotations to 70 years for loblolly and 80 for longleaf and used in combination with artificial cavities and designation of small recruitment stands.
- (2) Eliminate all lands from foraging habitat except that needed for the current population plus that necessary to accommodate the expected population increase for the next ten years.
- (3) Accurately disclose the sawtimber and roundwood volume that will be withheld as result of the implementation of this plan.

I appreciate the opportunity to comment on the plan.

Yours truly,

David Lang

Received Rew  
3/15/94  
70

WARREN A. HOOD

P. O. Box 4371

JACKSON, MISSISSIPPI 39296-4371

March 11, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W., Room 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

As a citizen of Mississippi, a private landowner and timber producer, member of both the Mississippi Forestry Association and Mississippi Lumber Manufacturers Association, I share the concerns of other citizens about the management of our National Forests. I also support the U.S. Forest Service in its efforts to manage and protect the Red Cockaded Woodpecker.

However, after review of the RCW EIS I find it totally unacceptable. I feel that recovery goals are too extravagant and habitat management measures required in the plan are in excess of that necessary to recover the bird.

The Mississippi Forestry Association has proposed changes to Alternative E. I fully support these changes as requested by the Association and ask that they be studied and carefully considered before a final decision is made.

Sincerely,

  
Warren A. Hood

WAH:sn

Response to Comments in Letter No. 70

From: Warren Hood

Comment No. Response

1. Comment noted

From: Evelyn Carey

Received RCU  
3/15/94

Evelyn Carey  
Rt. 3A

Springfield, Kentucky 40069

Apr. 4, 1899

— 25 — Tisch & Stuhl.

Concerning the red cascaded  
woodpecker, first I would like to  
know who counted them, every year  
I see this bird in my yard pecking  
in a pine post, you can confuse  
the bird with any other it is so  
strikingly handsome and different,

Was it <sup>the</sup> plane from Daniel Boone  
Theater, it flew a long way for a  
meal, Am sure they are all over  
Kentucky and can manage nicely.  
As that seems, what is being <sup>(2)</sup>  
planned for these birds is the most  
ridiculous thing I have ever heard.

Yours truly  
Evelyn Carey

Evelyn Carey

Response

Comment No.

1. Population monitoring of RCWs is undertaken by highly qualified people from the Forest Service, USDI Fish and Wildlife Service, Universities, State agencies, other institutions, groups and individuals. All are trained to recognize the subtle differences between the many species of woodpeckers that occur across the range of the RCW.
2. Comment noted.

NATIONAL COUNCIL OF THE PAPER INDUSTRY FOR AIR AND STREAM IMPROVEMENT, INC.  
DEPARTMENT OF AQUACULTURE, FISHERIES & WILDLIFE  
CLEMSON UNIVERSITY, CLEMSON, S.C. 29634-0362

March 14, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
USDA Forest Service  
1720 Peachtree Road, NW  
Room 718N  
Atlanta, GA 30367-9102

Dear Joe:

Thanks for the opportunity to comment on the *Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region*. It is obvious that you and your team have put much thought and effort into the EIS. I hope that my comments will help as you begin preparation of the final version. Please call if I can clarify any of my comments.

Sincerely,



T. Bently Wigley

TBW

Enclosure

cc: Dr. Alan A. Lucier  
Ms. Deborah B. Baker  
Dr. Larry L. Irwin  
Mr. Ed Muckenfuss  
Dr. James M. Sweeney  
AFPA Wildlife Committee, RCW Subgroup  
NCASI Eastern Wildlife Task Group

Dr. T. Bently Wigley  
Forest Wildlife Scientist  
(803) 656-0840  
(803) 656-3117

Bentley RCW

4/16/94

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NATIONAL COUNCIL OF THE PAPER INDUSTRY FOR AIR AND STREAM IMPROVEMENT, INC.  
DEPARTMENT OF AQUACULTURE, FISHERIES & WILDLIFE  
CLEMSON UNIVERSITY, CLEMSON, S.C. 29634-0362

FAX: (803) 656-5332

Dr. T. Bently Wigley  
Forest Wildlife Scientist  
(803) 656-0840  
(803) 656-3117

TECHNICAL REVIEW OF  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE MANAGEMENT OF THE  
RED-COCKADED WOODPECKER AND ITS HABITAT  
ON NATIONAL FORESTS IN THE SOUTHERN REGION

March 14, 1994

I INTRODUCTION

The subject publication is titled *Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region*. It presents 5 alternatives for managing red-cockaded woodpeckers on southern national forests, and discusses projected environmental impacts of each alternative. The proposed action is presented as an "ecosystem management approach," designed to restore the habitat conditions under which the red-cockaded woodpecker (RCW) evolved. The EIS presents projected impacts on biological, physical, and economic environments. However, this review deals only with projected biological impacts.

II TECHNICAL COMMENTS

The *Draft RCW EIS* proposes a change in management direction on national forest lands for the RCW. The proposed action would authorize delineation of Habitat Management Areas (HMAs) on forests with RCWs. Each HMA would have sufficient habitat to support  $\geq 50$  RCW groups; across the South, about 2 million acres would be included in HMAs. HMAs would be managed at different Management Intensity Levels (MILs), depending upon status of the resident RCW population. Under most MILs, irregular shelterwood would be used to perpetually retain  $\geq 6$  relicts per acre, thus creating 2-aged stands. Minimum rotations would range from 70 to 120 years, depending on species of pine. Growing season burns and herbicides would be used extensively to control midstory.

The *EIS* has many positive features. It strongly emphasizes forest management activities such as timber harvesting as tools for managing RCW habitat. The *EIS* addresses RCW management at the landscape level. There is a strong emphasis on new technologies such as augmentation, cavity inserts, and artificial cavities. The *EIS* also acknowledges the importance of monitoring and data collection. MILs are determined by the proximity of



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RCW populations to the carrying capacity of the HMAs and whether the populations are increasing or decreasing.

Technical review of the proposed actions revealed several opportunities to further improve the EIS. Those opportunities are discussed below.

1. **The need for a new strategy on all forests should be more fully explained.**

The EIS observes that since 1975, the Forest Service has emphasized "protection and management of the cluster and some amount of foraging habitat contiguous to it" (USDA For. Serv. 1993:355). And, the EIS notes that "in large well dispersed populations (Francis Marion, Apalachicola, Vernon [district of the Kisatchie]), this strategy seems to have been successful." Thus, the strategy of managing cluster habitat and associated foraging habitat has been successful in at least 3 cases. Because that strategy has been successful on these forests, it is unclear why the EIS does not propose continuing it, at least on those forests. A more complete explanation of the biological rationale for change where a successful strategy is now being used would be appropriate.

The EIS describes the proposed action as being designed to restore habitat conditions under which the RCW evolved (USDA For. Serv. 1993:ix). While an ecosystem-based approach is commendable, the EIS should clearly state what ecosystem conditions and processes are being restored and at what scale. Although some pre-settlement processes and conditions may be desirable, it is unlikely that the forests would ever return to that state under any management or non-management scenario. Thus, a more explicit description of desired forest condition should be provided. For example, will cataclysmic disturbances through fire, insects, etc., be restored to the forests? If so, at what frequency will they be permitted to occur? If not, why not and what activities will be used replace such events?

2. **The Draft RCW EIS proposes extensive use of an untested silvicultural technique about which there are many legitimate concerns.**

The proposed action admirably acknowledges the need to actively manage RCW habitat through timber harvesting. The EIS proposes extensive use of the "irregular shelterwood" method and the retention of  $\geq 6$  residual trees to create 2- aged stands. Irregular shelterwood regeneration differs from shelterwood regeneration in that the final cut probably will not occur at all, thus the overwood will be retained indefinitely. In the proposed action, irregular shelterwood would be used extensively in MILs 2, 3 and 4.

Unfortunately, irregular shelterwood "is an untested regeneration method for loblolly, shortleaf, and slash pine" (USDA For. Serv. 1993:62). It has been tested in longleaf pine over a 35-year period with poor results, silviculturally (USDA For.

Response to Comments in Letter No. 83

From: T. Bently Wigley

Comment No.	Response
1.	Comment noted. This is possible given the flexibility built into the direction. See Letter #193, Response to Comment #1.
2.	See Letter #193, Response to Comment #5.
3.	See Letter #33, Response to Comment #60 and Letter #143, Response to Comment #5.
4.	See Letter #113, Response to Comment #5, and Letter #119, Response to Comment #15
5.	See Letter #143, Response to Comment #3.
6.	See Letter #150, Response to Comment #3 and Letter #37, Response to Comment #2.
7.	See Letter #33, Response to Comment #42.
8.	See Letter #143, Response to Comment #6.
9.	See Letter #33, Response to Comment #12-16. For more information on the identified and predicted consequences of the alternatives, see Chapter 3 of the EIS.
10.	See Letter #143, Response to Comment #3. Suggestion noted concerning methods for adjusting management.
11.	See Letter #119, Response to Comment #8.

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Serv. 1993:62). Thus, there are legitimate questions regarding whether irregular shelterwood will successfully regenerate southern pines and provide long-term, continuous supply of suitable RCW habitat.

Interestingly, the U.S. Fish and Wildlife Service, in its biological opinion on the Texas Comprehensive Plan, ruled jeopordy because of the proposed use of an "unproven forest management system" (USDA For. Serv. 1993:35). They did so because no one could be absolutely sure about the success or failure of the system. Ironically, the *EIS* observes that "It is not certain that the irregular shelterwood method could supply a steady flow of RCW habitat in the long-term on many acres particularly where the parent trees (overwood) growth exceeds mortality for 10-20 or more years. A staged reduction in the parent trees on these sites would be required to prevent many trees in the younger age classes from dying or being severely suppressed" (USDA For. Serv. 1993:63). The *EIS* further notes that "Stands managed with 2-aged and uneven-aged methods are often difficult to burn without damaging or destroying the pine regeneration necessary to perpetuate the stands" (USDA For. Serv. 1993:206).

At best, the irregular shelterwood method does not appear to be the optimum method for producing RCW habitat. Dr. David H. Van Lear, professor of silviculture at Clemson University, has expressed concerns about this (Attachment 1). Modeling by Walker (1993) seems to confirm these concerns. That modeling indicated that "forests managed with balanced even-aged stands provided more potential cavity trees and foraging habitat than 2-aged stands and uneven-aged forests" (USDA For. Serv. 1993:212). Similarly, the *EIS* observes that longleaf pine stands with a residual 9 ft<sup>2</sup> of basal area would have about 70% fewer trees in the 8-, 9-, and 10-inch and larger diameter classes than in an even-aged stand where the shelterwood seed trees were removed" (USDA For. Serv. 1993:243).

Traditional forms of even-aged regeneration, e.g., clearcut, shelterwood, seedtree, would probably produce suitable habitat in the shortest period of time. To enhance rapid heartwood formation, Clark (1992) recommends silvicultural practices that "stimulate rapid growth of potential cavity trees throughout the rotation but maintain natural pruning." Therefore, it is not surprising that the *EIS* observes that "Clearcut stands which are planted, usually grow more trees to larger sizes, in a shorter period of time, than other regeneration methods" (USDA For. Serv. 1993:241).

One major concern about irregular shelterwood is that "Stands managed in this manner, although 2-aged, would develop the appearance of an uneven-aged stand" (USDA For. Serv. 1993: 189). And, as the *EIS* observes, stands with an uneven-aged structure do not "generally produce suitable nesting habitat, because all-aged stands develop a heavy, but necessary pine midstory. It [an uneven-aged structure] is not recommended for managing areas where production of nesting habitat is an

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objective" (USDA For. Serv. 1993:67). A heavy pine midstory is likely to develop if irregular shelterwood is used (Attachment 1).

Because of these limitations, it is unclear why the *EIS* recommends extensive use of the irregular shelterwood method. If the Forest Service wishes to use irregular shelterwood, it should consider doing so as an adaptive management experiment. Other options, such as shelterwood, seedtree, clearcutting, and perhaps new silvicultural techniques, could be simultaneously tested. Such tests and manipulative experiments would help determine which practices, or combinations of practices, will best provide a long-term supply of RCW habitat at the least cost.

3. The *Draft RCW EIS* proposes to maintain more residual trees than necessary for RCW cavity trees, and in some cases, foraging habitat.

The strategy of providing suitable cavity trees scattered across the HMAs has many merits. The *Draft RCW EIS* proposes to maintain at least 6 residual trees per acre on HMAs that are managed according to standards and guidelines for MIL 2 and  $\geq 10$  relicts for higher MILs (USDA For. Serv. 1993:188). Residual basal area would be 25-30 ft<sup>2</sup> for MIL 3 and 40 ft<sup>2</sup> for MIL 4. To provide the minimum residual basal area per acre at MIL 3 with only 10 residual stems, the trees must average 21-23 inches DBH. If only 10 residual trees per acre are provided under MIL 4, the trees must average 27 inches DBH to satisfy basal area requirements.

If, as the *EIS* predicts, RCW clusters will occur at a density of 1 per 200 to 300 acres, these guidelines will provide a minimum of 1,200 to 3,000 relict trees per RCW group. Many more suitable cavity trees will be found in RCW cluster, recruitment, and replacement stands. Probably, not all residual trees will be suitable for cavities. However, even if only 25% of the residuals are usable by RCWs, there would be at least 300 to 750 potential cavity trees available for each RCW group. If 50% of relicts are suitable, at least 600 to 1,500 potential cavity trees would be available for each group. These estimates likely are conservative. The technical basis for providing far more relict trees than actually needed is unclear.

Relict trees alone would provide a large proportion of foraging habitat for each RCW group. If groups occur at a density of 1 per 200 to 300 acres, under MILs 3 and 4 they would each have available a minimum of 2,000 to 3,000 large, residual stems. Under MIL 3, at least 5,000 to 9,000 ft<sup>2</sup> BA in residuals alone would be available. Under MIL 4, each cluster would have at least 8,000 to 12,000 ft<sup>2</sup> BA in residual trees. RCWs could forage on additional relicts in the cluster, recruitment, and replacement stands, and on smaller trees in all stands. The *EIS* should more thoroughly explain why this extremely high amount of foraging habitat is needed by RCWs.

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4. The *Draft RCW EIS* conclusions that fragmentation created by timber harvesting is a significant problem and most acute in small RCW populations may be premature.

The *EIS* concludes that regeneration near RCW clusters causes fragmentation, and that those consequences are most acute in small populations (USDA For. Serv. 1993:217). Those conclusions are largely based on data presented in Conner and Rudolph (1991). The study by Conner and Rudolph (1991) compared a measure of forest fragmentation (angular sum) and measures of regeneration activity (e.g., percentage of nonforest area within 800 m) among RCW clusters with different numbers of birds and clusters at different densities. Conner and Rudolph (1991) monitored bird numbers in each cluster for 2 years.

Basing management decisions solely on the study by Conner and Rudolph (1991) may be inappropriate. One reason is that results in Conner and Rudolph (1991) are somewhat ambiguous. Some data presented in that paper suggest levels of timber harvesting and cluster isolation were greatest around small RCW groups ( $\leq 2$  birds) in sparse populations. Other data, however, suggest that measures of fragmentation and the amount of regeneration actually were highest in dense RCW populations. Ironically, although several statistically significant relationships were identified, individual habitat variables explained little of the variation ( $\leq 9\%$ ) in the number of woodpeckers in each RCW group.

Conner and Rudolph (1991) proposed and used "angular sum" as their measure of fragmentation. They describe it as the sum of the "angular measure[s] of nonmature forest habitat as viewed from the cluster center out to 800 m" (see Attachment 2 for methods used by Conner and Rudolph 1991). There are several reasons why angular sum may not be an appropriate measure of fragmentation. First, the angular measure of individual habitat patches is greatly affected by their orientation to the cluster center, even if they are of equal size and shape (Attachment 3). Secondly, patches of greatly different sizes can have the same angular measure depending upon how close they are to the cluster center (Attachment 4). Taken to an extreme, a single-tree opening and a several-hundred-acre opening could have equivalent angular measures, depending upon their closeness to the cluster center. However, the 2 sizes of openings may have different biological consequences for RCWs. Patches of equal distance from the cluster center and having equal angular measures can vary dramatically in shape and area (Attachment 5).

According to methods described by Conner and Rudolph (1991), angular sum would not account for patches "hidden" behind the first habitat patch viewed from the cluster center (Attachment 6). Therefore, in Attachment 6, only the angular measure of patch 1 would be counted. The angular measures of patches 2 and 3, which are "hidden" by patch 1, would not be measured and their potential contribution to fragmentation would be ignored. Similarly, patches which overlap from the perspective



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of the cluster center would have a lower value for angular sum than if the patches did not overlap (Attachment 7). For these reasons, angular sum may not adequately measure fragmentation.

Other studies not thoroughly discussed in the *EIS* have indicated that fragmentation and timber harvesting have little or no effect on RCW reproduction. For example, Hooper and Lennartz (1993) removed 43% of foraging habitat from a dense aggregation of RCW groups with no discernible effect. They concluded that "low population density, *itself* [emphasis added], may be a major factor inhibiting expansion of some small populations." A study by Beyer et al. (in preparation) monitored RCW numbers on the Apalachicola National Forest for a 4-year period. They found no relationship between angular sum or amount of harvesting and the number of RCW adults and fledglings. Similarly, Wood et al. (1985) found no adverse effects after as much as 37% of habitat surrounding RCW groups was harvested. Wood et al. (1985) monitored reproduction for 3 consecutive years following timber harvest and colony status was checked 6 years post-harvest.

Collectively, the studies addressing fragmentation suggest that harvesting near RCW groups, even small groups, does not affect reproduction. At worst, the available studies on this topic could be viewed as inconclusive. Because of these and other uncertainties, the U.S. Forest Service should not assume that landscape patterns caused by moderate levels of timber harvesting adversely affect reproductive success. Rather, they should institute several long-term, simultaneous studies of habitat configuration and RCW reproductive success, population dynamics, and movements to more fully elucidate any potential relationships.

##### 5. The proposed rotation length for loblolly pine may be conservative.

The *EIS* proposes a rotation of 100 years for loblolly pine. Results in Clark (1992) demonstrate that 24-50% (depending on site quality) of loblolly pines have enough heartwood by age-class 60 for RCWs to excavate cavities. Clark's work demonstrated that site quality affects the number of trees with adequate heartwood. Thus, the *EIS* probably should consider site-specific rotation lengths.

Intensive management could possibly increase the number of trees with adequate heartwood. How many of these trees would be infected with red heart is not known. Although RCWs may prefer trees with red heart, it is not always necessary for cavity excavation. Clark (1992) observed that "Species differences in specific gravity of the heartwood core and outer heartwood and sapwood suggest the RCW might be able to excavate fast-growing loblolly pine with no redheart present." Based on their study of trees preferred for cavity excavation, Hooper et al. (1991) recommended rotations for loblolly as young as 75 years. Thus, adaptive management experiments testing several rotation lengths for loblolly pine on sites of varying quality would be appropriate.



6. The *EIS* proposes to manage entire HMAs, based on the status of the subpopulation with the highest risk of extirpation.

In HMAs with more than one demographic subpopulation, the *EIS* proposes applying to the entire HMA the MIL for the subpopulation with the highest risk of extirpation (USDA For. Serv. 1993:43). Thus, in a HMA with many RCW groups the status of a small subpopulation with few groups could unnecessarily drive management for the entire HMA.

Procedures are described in the *EIS* for designating sub-HMAs in some circumstances (USDA For. Serv. 1993:167). This strategy also could be used when one HMA subpopulation requires more intensive management. Habitat surrounding an at-risk subpopulation could be designated as a sub-HMA, and only the sub-HMA managed at the higher MIL.

7. The *EIS* proposes a prescribed burning schedule that may be unachievable.

The *EIS* proposes that 490,000 acres be burned each year, most during the growing season. This is far more acres than was scheduled for burning under the 1985 Handbook. This increased level of burning will be made more difficult because the number of suitable burning days will probably be limited during much of the summer, i.e., May through September. Other considerations such as air quality, smoke management, and liability problems also may restrict the acreage that can be burned. Because the Forest Service could not burn the acreage recommended in the 1985 Handbook, the *EIS* should more completely address how the Service will burn 490,000 acres per year, including the funding, personnel, and suitable burning days that would be required.

8. The *EIS* should more fully address the consequences of the proposed action on other wildlife and biodiversity.

The *EIS* predicts that controlling midstory hardwoods across large areas will have few consequences for mast-dependent wildlife. It projects that "overstory mast producers will be impacted very little, thus the "overall effect on mast dependent species is expected to be minimal" (USDA For. Serv. 1993:221). While this may be true for the near future, existing hardwood overstory trees eventually will die or require regeneration. If hardwood midstory is rigorously controlled, as proposed in the *EIS*, few hardwood midstory trees will be available to grow into the overstory. Thus, hardwood overstory trees eventually will be eliminated or greatly reduced. The *EIS* should address this concern.

The proposed action also calls for extensive prescribed burning, mostly conducted during the growing season. Because so many acres will require burning and suitable burning days are so few, burning likely will be conducted through late

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summer or early fall. Burning late in the growing season or after the growing season has ended could have undesirable consequences for wildlife species dependent upon understory vegetation and mast. Understory vegetation burned at this time may not regrow or regrowth may be limited. Thus, late fires could consume over large areas browse, forage, seeds, cover, soft mast, and some freshly fallen hard mast at a time when these resources usually are critical. It also is possible that frequent, hot fires could have deleterious consequences for long-term site productivity. Therefore, the *EIS* should fully address the effects on other wildlife of burning large areas late in the growing season or after the growing season has ended. And the *EIS* should address potential consequences for site productivity of frequent, hot fires, such as those that may occur with growing-season burning.

The *EIS* contains some predictions about effects on biological diversity that are not supported by data. For example, the *EIS* claims that pine restoration, i.e., longleaf pine restoration, will result in a "healthier ecosystem." Yet, there are no data available demonstrating that this will occur; in fact, the concept of a "healthy" ecosystem is rather nebulous and the current subject of much debate. Similarly, the statement that "Irregular shelterwood methods which retain overwood should not have cumulative [e]ffects on plants or animals at the stand level" is without technical basis. The *EIS* should more explicitly acknowledge the conjectural nature of such statements and propose a strategy for monitoring the effects of any proposed action on the environment.

9. **Proposed monitoring activities may yield ambiguous information and should be carefully designed.**

The *EIS* commendably proposes monitoring to determine whether the standards and guidelines are effective. However, because all of the national forests with RCWs will be using the same proposed guidelines, there will be no way of determining whether other management strategies or guidelines may be less costly or more effective. Also, it probably will be difficult to answer specific questions such as:

"Does the 25-acre limit for average patch size and leaving 30 ft<sup>2</sup> of pine basal area per acre" reduce fragmentation and help RCWs to recover (USDA For. Serv. 1993:190)?

Regardless, asking and answering questions in such a way merely will demonstrate how not to manage rather than how to manage. A far more effective way of learning about how RCWs interact with their environment would be to simultaneously test several alternative management hypotheses. Instead of only testing the effectiveness of a 25-acre patch size and 30 ft<sup>2</sup> of pine BA, a variety of patch sizes, landscape configurations, and residual basal areas could be tried. Some of the experimental treatments should be outside the range of those prescribed in the proposed action. Then, managers would begin to more fully understand how RCWs interact with their environment.

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Which habitats are monitored for RCW nesting activity should be carefully considered. For example, the *EIS* proposes conducting Group Surveys, in which 10% of "suitable" or "potential" RCW nesting habitat will be surveyed annually (USDA For. Serv. 1993:191, 194). Clearly, the definition of "suitable" and "potential" nesting habitat will greatly affect survey results. The Service should not let pre-conceptions of what constitutes suitable or potential habitat to influence survey results. Any survey methods used should be statistically sound.

10. Midstory control should occur before it blocks access to cavity trees.

The *EIS* proposes controlling midstory trees when they block access to cavity trees (USDA For. Serv. 1993:175). To minimize the risk of RCW's abandoning cavity trees and clusters, the Forest Service should consider controlling midstory trees before they block access to cavity trees or the line-of-sight between them.

III CONCLUSIONS

The proposed move to a ecosystem-based style of management at a landscape scale probably is reasonable and prudent. However, review of the *Draft RCW EIS* reveals several opportunities for improvement. The *EIS* should more succinctly explain why a new strategy is required, especially on forests where the 1985 Handbook direction has successfully maintained and increased RCW populations. Extensive use of irregular shelterwood may not be the best way to produce a long-term, continuous supply of RCW nesting habitat. Rather, harvesting methods which allow open growth of regenerating pines, e.g., clearcutting or seedtree, probably will produce suitable habitat most rapidly. The *EIS* should consider opportunities for reducing the proposed number of residual trees and rotation lengths. And the resources needed for achieving the proposed prescribed burning schedule should be described. The *EIS* also should consider removing midstory trees before they block cavity trees.

When all publications addressing timber harvesting and RCW reproduction are considered, the conclusion that timber harvesting causes fragmentation may be premature. Thus, the *EIS* may have more flexibility in harvesting activities near RCW clusters. The *EIS* should propose designating habitat surrounding declining subpopulations as a sub-HMA, and managing only habitat within the sub-HMA at a higher MIL. Monitoring activities should be carefully planned to yield answers useful to managers. And, the *EIS* should more thoroughly discuss potential consequences of the proposed action on other wildlife and biodiversity.

Because of these considerations, the *EIS* should present any proposed actions as part of an adaptive management strategy (e.g., Lancia et al. 1993). Thus, the proposed action would be only 1 of several hypotheses to be simultaneously tested in a series of coordinated, landscape-scale experiments. Such experiments would help identify a range of management strategies that could simultaneously provide RCW habitat and other benefits.

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#### LITERATURE CITED

- Clark, A., III. 1992. Heartwood formation in loblolly and longleaf pines for red-cockaded woodpecker nesting cavities. *Proc. Annu. Conf. Southeast. Assoc. Fish and Wildl. Agen.* 46:79-87.
- Conner, R. N., and D. C. Rudolph. 1991. Forest habitat loss, fragmentation, and red-cockaded woodpecker populations. *Wilson Bull.* 103(3):446-457.
- Hooper, R. G., and M. L. Lennartz. 1993. Short-term response of a high density population of red-cockaded woodpeckers to loss of foraging habitat. *In* D. L. Kulhavy, R. G. Hooper, and R. Costa, eds. *Red-cockaded woodpecker symposium III: Species recovery, ecology, and management.* In press.
- Hooper, R. G., M. L. Lennartz, and H. D. Muse. 1991. Heart rot and cavity tree selection by red-cockaded woodpeckers. *J. Wildl. Manage.* 55(2):323-327.
- Lancia, R. A., T. D. Nudds, and M. L. Morrison. 1993. Opening comments: slaying slippery shibboleths. *Trans. N. A. Wildl. and Natur. Resour. Conf.* 58:505-508.
- USDA For. Serv. 1993. Draft Environmental Impact Statement for the management of the red-cockaded woodpecker and its habitat on national forests in the Southern Region. *USDA For. Serv. South. Reg.* 460pp.
- Walker, J. S. 1993. Potential red-cockaded woodpecker habitat provided on a sustained basis under different silvicultural systems. *In* D. L. Kulhavy, R. G. Hooper, and R. Costa, eds. *Red-cockaded woodpecker symposium III: Species recovery, ecology, and management.* In press.
- Wood, G. W., L. J. Niles, R. M. Hedrick, J. R. Davis, and T. L. Grimes. Compatibility of even-aged timber management and red-cockaded woodpecker conservation. *Wildl. Soc. Bull.* 13:5-17.

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Attachments (not included here) to Comment Letter #83 (T. Bently Wigley)

Attachment 1 - Letter - Clemson University - David H. Van Lear

Attachment 2 - Graphic

Attachment 3 - Graphic

Attachment 4 - Graphic

Attachment 5 - Graphic

Attachment 6 - Graphic

Attachment 7 - Graphic



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*Second L.V.  
4/1/94*

BOBBY R. BOLTON, District 1  
JESSIE CLARK, District 2

JOHN ANDERSON, District 3

LAWRENCE LEE, District 4  
F. T. DEAKLE, District 5



PERRY

COUNTY

OFFICE OF  
BOARD OF SUPERVISORS  
NEW AUGUSTA, MISSISSIPPI 39402

PHONE NO. (601) 964-8370  
FAX NO. (601) 964-4260

March 14, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W., Room 718N  
Atlanta, GA 30367

Re: RCW EIS

Dear Mr. Dabney,

I am writing this letter on behalf of the Board of Supervisors of Perry County, Mississippi to contact you regarding the proposed RCW EIS. I hope that you will take time to read this letter, and, further, to consider the consequences as mentioned.

Perry County is a small county, both in geographical size and population base. Further, almost 40% of our county is in nation forest control. As you can understand, this has caused the assessed valuation, which is where the tax base is derived, to be markedly lower than other counties our size. In fact, in some cases this means our valuation nets as little as 50% of similar counties. Therefore, we rely a great deal upon the funds received from payments in lieu of taxes and timber harvesting from these national forests.

Please notice what we are not saying. We are not saying to abandon any animal to extinction. Further, we would support any solution based upon a rational examination of all circumstances. We do feel, however, that the anticipated loss in revenue would cripple our county. Already, we struggle to meet massive, unfunded federal mandates, and the loss of these timber funds would sentence the taxpayers of Perry County to shoulder an inordinate burden. Frankly, this is a burden we are unable to bear.

Response to Comments in Letter No. 89

From: John W. Anderson, Office of Board of Supervisors

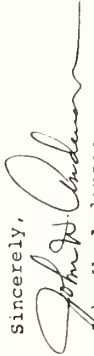
Comment No.

Response

1. See Response #27, Comment #1.

In conclusion, we ask that you examine not only the animal side of the equation, but please seek out information as to the drastic or catastrophic effects of the EIS as it now stands. We the entire board stands ready to assist you. We thank you in advance for your cooperation, and we look forward to a response.

Sincerely,

  
John W. Anderson,  
President

JWA/sr

cc: Hon. Trent Lott  
Hon. Thad Cochran  
Congressman Jamie L. Whitten  
Congressman Bennie Thompson  
Congressman Gene Taylor  
Congressman Mike Parker  
Congressman G.V. Montgomery

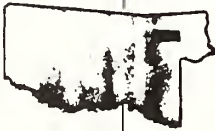
BOBBY R. BOLTON, District 1  
JESSIE CLARK, District 2

JOHN ANDERSON, District 3

LAWRENCE LEE, District 4  
F. T. DEAKLE, District 5

PERRY

COUNTY



OFFICE OF  
BOARD OF SUPERVISORS  
NEW AUGUSTA, MISSISSIPPI 39452

PHONE NO. (601) 964-4370  
FAX NO. (601) 964-8266

March 12, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W., Room 718N  
Atlanta, GA 30367

Re: RCW EIS

Dear Mr. Dabney,

I have been directed by the Board of Supervisors of Perry County, Mississippi to contact you regarding the proposed RCW EIS. I hope that you will take time to read this letter, and, further, to consider the consequences as mentioned.

Perry County is a small county, both in geographical size and population base. Further, almost 40% of our county is in nation forest control. As you can understand, this has caused the assessed valuation, which is where the tax base is derived, to be markedly lower than other counties our size. In fact, in some cases this means our valuation nets as little as 50% of similar counties. Therefore, we rely a great deal upon the funds received from payments in lieu of taxes and timber harvesting from these national forests.

Please notice what we are not saying. We are not saying to abandon any animal to extinction. Further, we would support any solution based upon a rational examination of all circumstances. We do feel, however, that the anticipated loss in revenue would cripple our county. Already, we struggle to meet massive, unfunded federal mandates, and the loss of these timber funds would sentence the taxpayers of Perry County to shoulder an inordinate burden. Frankly, this is a burden we are unable to bear.

Response to Comments in Letter No. 90

From: Paul D. Walley, Office of Board of Supervisors

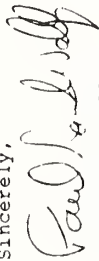
Comment No.

Response

1. Comment noted. See Response #27, Comment #1. Changes have been made between draft and final to minimize local adverse economic impacts.

In conclusion, we ask that you examine not only the animal side of the equation, but please seek out information as to the drastic or catastrophic effects of the EIS as it now stands. I stand ready to assist you, as does the entire board. I thank you in advance for your cooperation, and I look forward to a response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul D. Walley".

Paul David Walley  
Board Attorney

PDW/am

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MARCH 11, 1994

Mark A. Goodman  
206 Rivage  
Starkville, MS 39754  
Marvin C. Meier,  
1720 Peachtree St., NW  
Atlanta, GA 30367

Marvin C. Meier:

I am concerned that the draft environmental impact statement for the national forests of the Southern Region fails to take into account a management plan for the red-cockaded woodpecker.

As you may know, this species is on the national endangered list, which qualifies it for special consideration by the U.S. Forest Service. In this situation the special consideration needed is to include within the EIS a plan for encouraging the red-cockaded to expand its range onto forest service land. Currently, a breeding population is established on Novak National Wildlife Refuge. The refuge borders in one location with the national forest. In addition, the refuge and the national forest both border with Starr State Forest.

If the National Forest was willing to coordinate its management plan with the refuge and Mississippi State University, managers of the state forest, the range of the red-cockaded could be expanded, furthering its potential for survival. Surely, this is a goal worthy of consideration as part of the national forest management plan.

Sincerely,



Mark Goodman

Response to Comments in Letter No. 99

From: Mark A. Goodman

Comment No. Response

1. The proposed alternative allows for delineation of Habitat Management Areas (HMAs) to include adjacent private as well as public lands where a Memorandum of Understanding (MOU) has been signed for the purpose of joint RCW management. This has been done in Georgia and Texas.



# Alabama Woodpecker League

3320 Wellington Road  
Montgomery, AL 36106

Dedicated to Protecting the Woodpecker Species of Alabama  
and Their Habitats

March 14, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road NW, Room 718N  
Atlanta, GA 30367

Re: Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region

Dear Mr. Dabney:

Here are the comments of the Alabama Woodpecker League and of me personally. Although a plan such as this one should have been prepared 20 years ago, it is good that the Forest Service is taking its Endangered Species Act (ESA) obligations seriously.

While the Preferred Alternative appears to be capable of stopping the decline in the RCW's numbers and perhaps increasing the population to a limited extent, it is clearly not designed to recover the bird; even though, recovery is the legal obligation of the Forest Service under the ESA and is the stated goal in the Draft Environmental Impact Statement (DEIS). (DEIS at 11.) As shown in the Summary of the DEIS, the population objective will reach 500 active clusters on just three national forests and those three will thus be declared "recovered." (Summary at 7, DEIS at xi, Table S-1.) The DEIS states that 250 breeding pairs are needed to declare a population "recovered" (DEIS at 11), and under that definition, if 500 active clusters means 250 breeding pairs, then recovery is still not achieved. An active cluster may or may not have a breeding pair. The definitions used and the actual population goal that means "recovery" need to be reconciled and clarified.

The other main points we wish to comment on are:

(1) The DEIS cites and includes the Summary Report from the Scientific Summit on the Red-cockaded Woodpecker, held March 28-30, 1990, but the DEIS does not follow even

Response to Comments in Letter No. 100

From: Ray Vaughn, Alabama Woodpecker League

Comment No. Response

1. The Sam Houston and Chickasaw populations should have been included among those that can be recovered. Those that are designated as recovery populations and have less than 500 active clusters as their goal, have nearly all of the available National Forest land base included, i.e. there is no more National Forest land available for recovery.
2. We are using the familial definitions provided in Appendix G.
3. Comment noted.
4. All of the rotation ages are within the range of rotation ages recommended by the Scientific Summit. We reiterate those here:  

	Scientific Summit	FEIS and Selected Alternative
Longleaf Pine	100-250 years	120 years
Shortleaf Pine	80-150 years	120 years
Loblolly Pine	80-120 years	100 years
5. The reason for including this option is not to create more younger trees, but avoid a large age class in the future of very old trees. What we will attain is a constant amount of old trees through time. See also Response #33, Comment #6.
6. Our obligation under ESA is to follow the Recovery Plan for this species. The Recovery Plan does not include restoration of this species to all of its original range.
7. The selected alternative includes foraging habitat requirements that are for trees at least 30 years old, which is a change from the DEIS.
8. RCW clusters, recruitment and replacement stands are not part of the acres available for timber harvest. We acknowledge that as RCW populations increase, acres for timber harvest will decline.
9. The selected alternative recommends both evenaged and unevenaged management methods. Evenaged methods are limited to seedtree, shelterwood, irregular (modified) seedtree and irregular (modified) shelterwood techniques, depending on the Management

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the minimum consensus recommendations set forth in that Report. Failure to follow even the minimum guidelines agreed to by the best scientists in the world on the woodpecker shows that this DEIS and the Preferred Alternative are not acceptable.

(2) According to the very science cited by the Forest Service in the DEIS, the minimum rotation ages for the trees in woodpecker habitat are way too short, just 70-120 years. These birds need old growth pine forests, and this short a length of time means that many of the potential nest trees will be cut just as they are getting to the best age for the birds to utilize for nesting. The plan must be changed to have more appropriate and scientifically justified minimum rotations of 80-250 plus years, depending on pine type.<sup>1</sup> Alternative C comes closest to the Report's recommendations with minimum rotations of 80-200 years. Further, the very data from the DEIS itself shows that longer rotations produce a greater number, variety and balance of potential cavity trees in Longleaf pine. (DEIS at 210, Figure 3-2.) Under any method of timber harvesting, rotations of 150, 200 and 250 years give better results for potential cavity trees than 100 and 120 year rotations. Since the Forest Service's legal duty under the ESA is to do what is best for the RCW and not what is best for timber production, rotation ages must be made longer. Because both the Forest Service's own data and the consensus opinion of the world's experts on the RCW point to rotations of much more than 120 years, any final plan that keep the Preferred Alternative's rotations will not be likely to pass legal muster.

(3) The plan will guarantee no cutting of trees old enough to provide cavities for the birds only until they are within 10-20 years of the minimum rotation age. Thus, the planned 70-120 year minimum rotation becomes a de facto 50-100 year rotation. This is unacceptable; the Forest Service should say what it means. A 120-year minimum rotation should mean 120 years, not 110 or 100.

(4) The DEIS fails to plan on reintroducing the woodpecker to National Forests where the Forest Service has already wiped it out, even though, such reintroduction is possible. The Forest Service claims that such reintroduction is currently too expensive and difficult. Even if that is true, it should not be ruled out for the future when new knowledge about the bird may make reintroduction easier and less expensive; this is, after all, a 30-year plan, and funding and technology, say 15 years from now, may allow for establishment of support populations on National Forests excluded under the current Preferred Alternative. Under the ESA, the Forest Service is legally bound to do ALL that it possibly can to recover

<sup>1</sup>The range is for various pine tree types. For the Preferred Alternative, the minimum rotation would be for Virginia pine: 70 years, Loblolly and Slash pine: 100 years, Longleaf and Shortleaf pine: 120 years. The different pine species take different lengths of time before they develop heart rot and are suitable for the birds to build nests in them. The birds will use all these species, but they prefer Longleaf. According to the consensus at the Scientific Summit on the Red-cockaded Woodpecker, the minimum rotation ages should be 100-250 plus years for Longleaf, 80-150 years for Shortleaf, and 80-120 years for Loblolly.

Intensity Level. Irregular means that some overstory trees will be retained indefinitely.

10. The data from Table 3-2 show:

	100 year rotation	120 year rotation	250 year rotation
Shelterwood	10,000 trees	14,000 trees	19,000 trees
Mod. Shelterwood	13,000 trees	16,000 trees	18,000 trees
Group selection	5,000 trees	7,000 trees	9,000 trees

These figures are for each 1,000 acres of longleaf pine habitat.

If these figures are taken in conjunction with our reply at #4 above, we think we made a reasonable selection.

11. Comment noted.

12. See #6 above. In addition, we have old growth initiatives in many National Forests in the South which will provide some areas that you suggest. The Kisatchie National Forest has active RCW clusters in wilderness.

13. Comment noted.

14. Comment noted.

15. Comment noted.

16. Comment noted.

17. We too are concerned about hardwood forests. There is no place in this plan that calls for converting hardwood forest to pine.

this species.

In Alabama, this includes the Tuskegee National Forest. Such a limitation will mean an unnecessary limit on how much the Forest Service will allow the bird's numbers to recover and will mean fewer viable populations of the bird than is reasonably possible and legally required under the ESA. The Tuskegee has supported three clusters within just the last few years, and it is capable of providing habitat for a support population. Further, there are a number of quail plantations on private lands in the area of the Tuskegee. Thus, it may be feasible sometime in the near future to relocate RCW from those private lands to the Tuskegee, but if the Tuskegee is not managed for that possibility, the chance will be lost. It will not require additional funding or technology to require rotations of Longleaf pine forest in the Tuskegee (and other forests left out of this Plan) in line with the rotations in the Habitat Management Areas (HMAAs) on the other forests.

(5) Despite the Forest Service's assurance that every alternative would follow the Fish and Wildlife Service's Blue Book guidelines on woodpecker foraging needs, the Preferred Alternative does not. The foraging habitat must be, at a minimum, 6,350 pine trees greater than 10" diameter, 30 years or older within 1/2 mile of and connected to the clusters. The Preferred Alternative maintains this density only for trees 25 years old. This must be changed if the Final EIS is to be legally acceptable.

(6) The Forest Service assumes that all woodpecker habitat will be available for timber harvesting of some means or another, and even-aged management is heavily emphasized. All of the Forest Service's alternatives in the DEIS make sure that timber production from the Southern Region National Forests is at least 70 percent of the current level. The Preferred Alternative produces timber at 85 percent of the current level. Oddly, Alternative C, with the longer minimum rotation times, would produce slightly more long-term jobs and more revenue than the Preferred Alternative; then why have the shorter rotations? The ESA requires that a plan for recovery of a species do all that is possible for that species. The Forest Service rejected any proposed alternatives that would have reduced the timber production below 70 percent of its current level, and the reasoning throughout the DEIS seems tied more to timber management than to woodpecker biology and habitat ecology.

As stated by Robert W. McFarlane in *A Stillness in the Pines*, "We must replace clearcutting practices with uneven-aged management or greatly modified shelterwood harvest" if the RCW is to be saved on the National Forests. (McFarlane at 249.) It is curious and somewhat unsettling that in the vast amount of literature cited, the DEIS does not cite nor refer to this book, which is the premier book on the RCW. The Preferred Alternative's heavy reliance on even-aged management for timber harvesting appears not to be in the best interest of the RCW, which is the legal mandate under the ESA. Under the ESA, you do not have the authority to "balance" the interest of recovering the bird with maintaining commercial timber harvesting on the national forests; you must put the bird's needs foremost, and if those needs are compatible with commercial timber harvesting, then

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fine. According to the experts, even-aged management is not compatible enough to be allowed under the ESA

According to the DEIS, the number of potential cavity trees in Longleaf pine increases to the maximum possible amount under modified shelterwood and group selective cutting methods and longer rotation ages. (DEIS at 210, Figure 3-2) Thus, from the Forest Service's own data, the best variety, age balance and availability of potential nesting trees comes from shelterwood with 20% in clumps<sup>2</sup> in rotations of 150 years and 200 years. From your own data, the Preferred Alternative will not produce the best result for the bird; significantly longer rotations and greater use of uneven-aged timber harvesting or modified shelterwood would be best. Even with the 120-year rotation, the SW-20% CI produces the best result.

The rejection of alternative "(3) Total uneven-aged management" (DEIS at 33) states that although the RCW's natural habitat was indeed uneven-aged forest, even-aged management must be used to recreate patches of even-aged forests that existed historically. The Forest Service is confusing two things here: timber production methods and natural forests. Historic RCW habitat was not managed for uneven-aged timber production; there was no timber production at all, and the forest happened to be mostly uneven-aged. Even-aged timber methods cannot reproduce such a forest, because openings caused in a historic, natural RCW forest did not haul the wood away to a mill somewhere else. It is clear that timber production methods are not what should guide management of RCW habitat; if so, such a plan would clearly be illegal under the ESA. Selective or modified shelterwood uneven-aged cutting methods can restore and maintain the RCW's habitat without need for even-aged methods at all.<sup>3</sup>

(7) The DEIS makes no provision for leaving some areas to operate indefinitely as Nature wills. Under the Preferred Alternative, all of the woodpecker's habitat would be cut at some time; there will be no areas where trees will be left to age to the 250 plus years recommended by the scientists. The DEIS rejects Alternative D which provides for no harvesting of the older trees and no minimum rotation, because the Forest Service says that the National Forests are too fragmented and too altered from their natural condition to allow

<sup>2</sup>It is important to note that this figure considers only four harvesting methods: clearcutting, shelterwood, shelterwood with 20% in clumps, and group selective cutting. To be fully descriptive of the possible outcomes of all possible timber harvesting methods that would be allowed and utilized under this plan and EIS, this figure should have also considered: irregular shelterwood -- 40 basal area-staged removal-20% in clumps, irregular shelterwood -- 40 basal area-no removal-no clumps, irregular shelterwood -- 30 basal area-no removal-no clumps, and single-tree selection.

<sup>3</sup>Of course, for the limited purpose of converting inappropriate pine plantations, like those of Slash pine, back to native and natural Longleaf pine, clearcutting would be proper



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them to grow unmanaged by man, that protection of the bird will require constant hands-on management. While it is true that the present landscape in the South is so altered by man that we cannot just "let it all be" and insure that the bird or any other species will be provided for, it is false to assume that we must micro-manage every acre. The plan for the woodpecker must include plenty of direct management in order to restore its habitat; however, there is a place for allowing some areas to grow, mature and then remain uncut and unhindered by mankind. If we are recreating habitat suitable for the woodpecker, then we do not have to continually destroy all of it and recreate it elsewhere in the forests on a rotating basis (as this plan provides); we can let some of it return to a natural order once it is recovered and leave it alone. As stated by Robert McFarlane:

"The implications of a perpetual thinning of the forests, as the primary harvest method, must be objectively studied by silviculturists. We must abandon as intellectually bankrupt the current 'man knows better than Mother Nature' mentality. We must learn to plan and work with nature, not against it, for nature always wins. Time is on its side." (McFarlane at 249.)

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Nature knows best, and the Forest Service's claim that that is no longer true (DEIS at 415) is not good science. The DEIS cites Dr. Reed Noss for the proposition that "Nature if given a chance--can still manage land better than we can." (DEIS at 415) and then goes on to reject that opinion. Dr. Noss is a Pew Charitable Trusts Scholar in Conservation and Environment and one of the world's foremost authorities on conservation biology and wildland preservation. The Forest Service seems to think that because man has so changed the natural cycle of our forests, forests now left unmanaged by mankind will degenerate into some kind of forested nothingness. The rejected alternative "(1) Preservation" (DEIS at 32) was dismissed because the Forest Service could not actively manage the RCW's habitat, and the reason for rejection was that natural disturbances of the habitat which had sustained the RCW through millennia would no longer work. Yet that same statement includes the contradictory statement that wildfires would not be suppressed. Are not wildfires natural disturbances that played a major role in RCW habitat for thousands of years? The Forest Service is confusing two things: just letting the land go its own way from the point it is now and allowing nature to manage the land once we restore it to its natural regime. Yes, management is very needed to replace and restore RCW habitat in large enough areas such that the bird can recover, BUT once those habitats have been restored, they will not need constant Forest Service intervention and "management" in order to sustain themselves and the RCW in perpetuity. The key is to restore large enough tracts of RCW habitat and then let Nature do the management. Such an approach of guided management leading to restoration of "management" by natural processes is scientifically sound and supported by the foremost biologists today, including Dr. Noss and others the DEIS cites like Dr. Michael Soulé, co-founder of the Society for Conservation Biology and a professor at the University of California at Santa Cruz.

The DEIS actually seems to suggest that natural processes and forest regeneration will no longer occur unless man does it for Nature. (DEIS at 411-15.) In total reliance on



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mankind's active management, the DEIS rejects offhand a proposed alternative to allow Nature to take its course and to let all the National Forests recover and grow naturally, and the DEIS never considers a hybrid approach which makes the most sense. Some of the woodpecker's habitat, once adequately restored, should be protected in perpetuity as designated wilderness so that it will never be cut again. Or perhaps there can be a hybrid wilderness or wildlands designation that preserves an area as wilderness but allows certain levels of management to mimic and restore natural disturbance regimes. Wilderness can only be designated by Congress, but the Forest Service has the authority to identify such areas for possible designation and to suggest to Congress that such legislation be passed. Any plan for the Red-cockaded Woodpecker should include consideration of significant wilderness areas that allow some of the habitat of the bird to recover and remain indefinitely in a natural state.

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Further, the Preferred Alternative even proposes to lure woodpeckers out of current wilderness areas so that the Forest Service can manage them more. This blind faith the Forest Service has that it can manage the bird better than God and Nature can displays extreme hubris. Remember, it was the Forest Service that has shoved the woodpecker to the verge of extinction in the first place over the last few decades. It has been the admitted mismanagement of the Forest Service that has led to most of the decline of the RCW on the National Forests over the last two decades. Such mismanagement that has harmed the RCW and its native habitat was admitted to in a Forest Service publication, "Ecosystem Management: Alabama, An Ecological Approach to Forest Management," Forestry Report R8-FR 42 (October 1993). For the Conecuh National Forest, the Forest Service admitted that it replaced much of the native Longleaf Pine Ecosystem with Slash Pine, which was more valuable for timber. This booklet states, "About 5 years ago, the Forest Service realized this [Slash Pine conversion] was not proper ecosystem management and is now looking at many areas where slash pines were planted to be converted back to longleaf pine." (Booklet at 8.) Regarding the Oakmulgee, this publication states:

"In addition, the Forest Service removed fire from the ecosystem and until 1984 work centered on changing the ecosystem from one that had native longleaf pines and hardwoods to one with more of a loblolly pine environment. The idea was to grow loblolly pine on a short rotation in order to maximize the production of timber.

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"By 1984, it became apparent that we were losing some old-growth species. That year was when the Forest Service began working to protect and enhance the endangered red-cockaded woodpecker." (Booklet at 12.)

If the Forest Service had been managing properly for the RCW since the time it was listed as endangered on all the National Forests where it occurred, then this whole process would not be happening today. To say that the Forest Service has suddenly "gotten religion" and will do a complete 180-degree about-face and start using proper ecosystem management for the RCW sounds good, but forgive us if we are skeptical. As much as is possible, we

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would rather place our bets on Mother Nature than on the U.S. Forest Service, and the final plan and EIS should allow as many opportunities as possible and as much flexibility as possible for allowing the bird and its natural, wild habitat to recover and remain indefinitely, as Nature intended.

Among the positive things in the DEIS and plan, we think that it is appropriate to include a support population HMA in the Bankhead National Forest. Many people are worried that this plan will be used to convert hardwood forests, particularly in bottom lands, to pine in the name of preserving the RCW. All possible means to prevent such misuse of the plan must remain in the final EIS. As the Bankhead shows, the historic range of the RCW can be protected and enhanced on the part of the forest where it once was without adversely impacting on the areas of native hardwood forests.<sup>4</sup> Despite the loss of RCWs on the Bankhead, the tentative HMA set forth for that forest looks appropriate and suitable for a support population.

Please keep us informed of the progress of the plan, and please send us the final plan, EIS and record of decision.

Sincerely,



Ray Vaughan  
Pro se and attorney for  
Alabama Woodpecker League  
3320 Wellington Road  
Montgomery, Alabama 36106

<sup>4</sup>Of course, this plan will have no impact on actively preserving hardwood forests in the Bankhead. Unfortunately, these natural forests are under attack and being needlessly converted to pine due to forces and faulty reasoning that has nothing to do with the RCW

Received  
3/15/94  
(101)

WILLIAM TRIMBLE GREEN  
103 ELLIUVILLE BOULEVARD  
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LAUREL, MISSISSIPPI 39442-2067

BUSINESS TELEPHONE  
601-640-8024

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March 14, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road, N.W., Room 718N  
Atlanta, Georgia 30367

Dear Mr. Dabney:

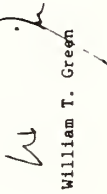
As a landowner in Jackson, Jones, George and Perry counties of Mississippi, I am very concerned about the management of our National Forests. I also strongly support the U. S. Forest Service in its efforts to manage and protect the Red Cockaded Woodpecker.

The RCW EIS as written however, has many unacceptable and unreasonable provisions in that the recovery goals are far too extravagant and habitat management measures required in the plan are far in excess of that necessary to recover the bird.

Recommendations from private, as well as public, land managers should be implemented.

I appreciate the opportunity to comment on the plan and respectfully request that you consider these suggestions when making the final decision.

Sincerely,

  
William T. Green

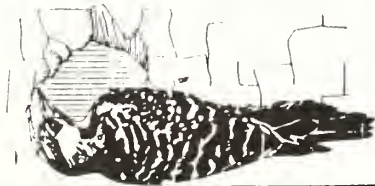
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Response to Comments in Letter No. 101

From: William Trimble Green

Comment No. Response

1. See Response #133, Comment #1.
2. We have sought and received many useful comments from land managers from all across the South.
3. Comment noted.



# OKTIBBEHA AUDUBON SOCIETY

P.O. Box 2041  
Starkville, MS 39759

March 18, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Road, NW, Rm 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

The Oktibbeha Audubon Society has participated in red-cockaded woodpecker surveys at Noxubee National Wildlife Refuge since 1989. We are acutely aware of their plight and extremely interested in their survival opportunities--especially in Mississippi.

We urge maximum protection for RCW in the national forests and support Proposal E, but we believe the foraging requirements should be increased. Trees older than 30 years and a 12" diameter should be required. Maximum foraging area will encourage and allow successful reproduction and survival--both critical to the success of the management plan.

We request that the Tombigbee National Forest in Mississippi be included in the management plan. RCWs could quickly and economically return to the Tombigbee with cavity inserts and cluster-site preparation and protection. A cooperative management agreement between Tombigbee NF and Noxubee NWR would offer the small but growing RCW population at Noxubee NWR the opportunity to recover.

We commend the US Forest Service for recognizing its critical role in the management and recovery of RCWs. We look forward to the implementation of these plans and the sustainable populations of RCW that will exist in the future. Please contact our organization if volunteers are needed to assist in any endeavor.

Sincerely,

*W. Lawrence Croft*

W. Lawrence Croft, President

W. Lawrence Croft  
President

John P. Reinicke  
Vice President

Dianne Patterson  
Recording Secretary

Joseph M. McGee  
Corresponding Secretary

Lou Kilgore  
Treasurer

Margaret S. Copeland  
Newsletter Editor

Response to Comments in Letter No. 109

From: W. Lawrence Croft, President of Oktibbeha Audubon Society

Comment No.

Response

1. The foraging habitat guidelines are based on USDI Fish and Wildlife Service requirements.
2. Comment noted. Proposed Habitat Management Area (HMA) delineation is based on the distribution of RCWs in 1986. Inclusion of other areas for RCW management is optional.
3. Comment noted.

# SIERRA CLUB



Mr. Joseph M. Dabney  
RCW EIS Team Leader  
USDA Forest Service  
1720 Peachtree Rd., NW  
Atlanta, GA 30367

Re: Comments on the Region 8  
EIS for Recovery of the  
Red-cockaded Woodpecker

Dear Mr. Dabney:

Here are the comments of the Lone Star Chapter of Sierra Club concerning the EIS for the recovery of the red-cockaded woodpecker:

- 1) The Preferred Alternative, E, uses an untried and unproven modified shelterwood system and relatively short rotation ages, that are obviously more geared to maximizing timber production (within minimal legal constraints) rather than maximizing the R-CW's chances for long-term recovery.

The Forest Service should not jeopardize the future of the R-CW by second-guessing the proven success of the court-ordered system in Texas (a whopping increase of 50 colonies in just the last three years!). Rather than a modified shelterwood system, the best system for the future of the R-CW, the prudent and conservative system, would be a modification of the system ordered in Texas National Forests by Judge Parker in 1988: to wit, exempting riparian zone from the Court's order for midstory removal, and in non-riparian zones reducing mid-story hardwood removal to the minimum necessary for the birds.

2) Following are notes taken from comments made by Dr. Jerome Jackson, the world's foremost expert on the Red-Cockaded Woodpecker, on June 20, 1992, during a visit to Little Lake Creek Wilderness and the Four Notch area of Sam Houston National Forest. We urge that Dr. Jackson's comments below be given the serious consideration due to such a recognized authority:

- a) The Forest Service uses flying squirrels as an excuse for removing hardwoods, but this is not a good reason because flying squirrels have lived with the R-CW for thousands of years.
- b) The midstory needs to be open, but there is no need to remove every hardwood. What is needed is a natural mosaic.
- c) Prescribed burning is better in summer because that is the natural burn season. And rather than burn every 5 years, it would be better to burn at irregular intervals, with some intervals less than five years and some more than five years.
- d) One problem with using shelterwood for R-CW habitat management is that basal area is so low that wind-

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." John Muir



O V E R

Response to Comments in Letter No. 110

From: Lone Star Chapter of Sierra Club

Comment No.

Response

1. The court-ordered Texas comprehensive plan was determined "to likely jeopardize the continued existence of the RCW" in a biological opinion from the USDI Fish & Wildlife Service (35). Through short term population improvements have been witnessed in Texas, much of the improvement is attributed to habitat improvement at cluster sites (artificial cavities, augmentation, and midstory control). Long term habitat improvement must allow flexibility for some of the court-ordered mandates; the proposed action attempts to insure a continuous supply of habitat through the modified shelterwood system. This system is not "geared to maximizing timber production" as you have stated. The impact to timber production by use of the irregular shelterwood system is explained in DEIS, page 62. This system offers the flexibility to provide both habitat and sufficient regeneration through staged overwood reduction; the lack of regeneration was the primary concern in the court-ordered plan.
2. Dr. Jackson's comments are noted, and in general are incorporated into direction of the proposed action through retention of 6 snags per acre, hardwood midstory and overstory allowances, emphasis on growing season prescribed burning, a modified shelterwood system, which reduces windthrow, and emphasizes management for RCW clusters outside of existing wilderness areas. Methods of controlling outbreaks of SPB are not within the scope of the RCW EIS.
3. Rotation ages are based on the best available information to supply a continuous supply of high quality RCW habitat in perpetuity. These rotations will ensure large areas of older forest without the rise of catastrophic events or SPB epidemics. Potentially a significant number of trees that are much older than the stated rotation ages will be present throughout the HMA. In Texas, should the 80 year loblolly pine rotation for SPB considerations be implemented, all overstory trees will be left in perpetuity (282). All clusters, recruitment and replacement stands will have no rotation established and would remain until they no longer provide suitable nesting habitat (43). These stands will provide numerous stand sized (10 acres or larger) patches throughout the HMA that allows the older forest or relict tree characteristics (see glossary).
4. Comment noted. Stands that are damaged or understocked will be regenerated only after careful site specific analysis that ensures the best development of RCW habitat; including species selection, ecological needs of the area and impacts to the surrounding HMA habitat.



throw becomes a major problem.

- e) Buffer-cutting in an attempt to control southern pine beetle (SPB) eliminates all pine in the area, including those that have a genetic resistance to SPB.
- f) Richard Conner has documented R-CW feeding on fallen pine slash; therefore spraying slash with insecticide endangers the R-CW.
- g) Don't cut R-CW cavity trees (dead or alive) for any reason.

3) The rotation age for the preferred alternative is too low (80 years for loblolly and 120 for longleaf). There is ample documentation that R-CWs nested preferentially in pines much older than 100 years. The suggested rotation ages are quite obviously derived from a timber-production concern, i.e., culmination of mean annual increment of growth, rather than a concern for the biological requirements of the R-CW. Older trees are needed, for one thing, to allow the development of red-heart fungus, which facilitates cavity excavation.

The whole matter of providing for future regeneration is forced into the conventional timber-production paradigm of forests regulated into even-aged stands "balanced" into arbitrary ten-year age classes. This sounds like traditional business-as-usual timber production management, not ecosystem management.

While relict trees will be retained, these eventually will die and will not be replaced by trees of equal age. By the end of the eleventh decade, in the example given for the Raven Ranger District, there would be no loblollies in the over-80 years age class. By the end of the sixteenth decade, in the example from the Vernon Ranger District, there would be no longleaf over 120 years of age. This cannot in any wise be viewed as ecosystem management, because we know that in the virgin ecosystem loblollies lived over 150 years and shortleaf and longleaf several centuries.

We suggest that a better rotation age, to be accomplished within stands by use of selection management, would be 150 years for loblolly and 200 years for shortleaf and longleaf. We also suggest that longer-interval age classes than ten years be used, based on research of virgin and long-growth second-growth forests.

4) Stands which are damaged or understocked should not simply be clearcut and replanted. Such areas should be carefully and selectively restocked, preserving what good trees survive. Some trees are better for the R-CW than no trees.

5) Clearing for non-timber management should not be allowed in R-CW habitat management areas, nor should any new campgrounds, ORV trails or other forest-disturbing recreational facilities be constructed in habitat areas.

6) We have some concerns with the triage system in the levels of management intensity. Where R-CW are thriving on their own and expanding on their own into new territory, we believe

5. Clearings for non-timber management would only occur within 1/4 mile of active or inactive clusters. Clearings between 1/4 and 3/4 miles of these sites could only be allowed after rigorous site-specific environmental analysis (91). Outside 3/4 mile zones the project proposing clearings would not be allowed or limited if it caused a break between foraging habitat and the cluster or recruitment stand (195). In all cases, these project clearings would involve environmental analysis, disclosing any known affects to the existing RCW habitat in the project area and HMA.
6. Management intensity levels were designed to reflect vulnerability of an RCW population, providing managers assessment of risk of extirpation. Management intensity level (MIL) 4 would be greatest in the smallest, most vulnerable populations (41). The management intensity level directs actions that should assure all populations the ability to expand. Monitoring will likewise be more intensive on smaller, more vulnerable populations, and should assure all populations reach the objectives (162).
7. NFGT app. 5 percent East Texas Timberland. The Forest Service agrees that artificial cavities and translocation are extremely intensive management practices that should generally be undertaken only to support populations until habitat conditions improve and natural reproduction is assured. As proposed, the strategy in Alternative E would ultimately restore the habitat conditions under which the RCW evolved and eliminate the need for extreme population management measures as described.
8. The Final EIS will identify foraging habitat as 30 years or greater.
9. The Forest Service efforts are to maintain high quality RCW habitat in perpetuity. Lack of regeneration will not assure this long term objective and is the premise behind the USDI Fish and Wildlife Service jeopardy opinion (35). If the USDA Forest Service is to achieve this goal, while maintaining viable populations of RCW on the 11 National Forests, some regeneration of existing RCW habitat must be directed.
10. Even-aged management has been used successfully on the Vernon RD of the Kieatchie, Francis Marion and Appalachicola National Forests successfully maintaining large viable RCW populations. These areas have demonstrated over the long haul that they (EAM) provide the most dense population, much more dense than UEAM. The court-ordered plan was developed as an alternative, but later eliminated due to the USDI Fish & Wildlife Services jeopardy opinion (35).

that intrusive management can be dispensed with, but protective management must always be at a high level. We are also concerned that populations of less than 50 colonies may not receive adequate management. We do not want to see such populations written off because they are perceived as "unsustainable" by an agency we have learned not to trust.

7) While we agree that heroic measures such as installing artificial cavities and translocating individual birds are often necessary in the emergency situation that still exists in most R-CW populations, and while we applaud the scientists and workers who have achieved notable success using these measures, we see such measures as what in fact they are, stop-gap measures that are necessary in the short term, sort of like a blood-transfusion or oxygen may be necessary for a critically ill patient in a hospital. But the clear goal must be to restore the R-CW to healthy population levels across its natural range, living in its natural, independent ways. We see a clear danger that some of these measures could be misused to promote timber-production goals rather than the goal of recovering the R-CW to a point of renewed self-sufficiency. (In other words, we don't want to see a clearcut forest with a few telephone poles sticking up here and there with artificial cavities nailed to them, with hatchery-bred woodpeckers trained to feed at backyard suet feeders.) Prolonged use of artificial cavities may predispose the birds to stop excavating their own cavities.

8) No documentation was offered to substantiate the claim that 25-year old pines constitute good foraging habitat.

9) We think the EIS was somewhat biased against Alternative D. The EIS states that Alternative D cannot regenerate enough old trees over the centuries to come because of the lack of timber harvesting. This completely fails to take account of the fact that virgin forests perpetuated themselves quite well without the aid of human-devised silvicultural systems and R-CW populations were flourishing in the virgin forests. Over the term of future centuries, just as in past centuries, there will be many natural disturbances -- wind, storm, fire, insect outbreaks, etc.-- which will kill old trees and regenerate young trees, including mixed forest dominated by pine.

10) It was even-aged management which brought the Red-Cockaded Woodpecker to the brink of extinction in the first place. In east Texas, the use of selection (uneven-aged) management as ordered by Judge Parker, has reversed the decline and proven to be very successful. To think of returning to the system that caused the problem in the first place, even to a modified version of that system, runs counter to common sense and to scientific objectivity. The only rationale that can possibly underlie such a proposal is simply to maximize timber production and still save some birds, as few as legally possible. It is not a good plan for the R-CW.

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Thank you for the opportunity to comment on the R-CW Recovery EIS. We hope that our comments will be acted upon and a better management plan created. We request a copy of the Final EIS and Management Plan be sent to the address on the letterhead when they are issued.

Sincerely,

*Tom Maddux*

Tom Maddux  
Chairman, National Forest Protection Campaign  
3400 Ocee, #212  
Houston, TX 77063

111

RCW  
5/2/1997



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Marvin H. Pritchett, President  
Wm. Carroll Lamb, Executive Vice President

March 18, 1994

Mr. Joseph Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Road, NW  
Room 718N  
Atlanta, Georgia 30367-9102

Dear Mr. Dabney:

The Florida Forestry Association appreciates the opportunity to comment on the Draft Environmental Impact Statement for Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region (RCW DEIS).

It is our belief that the single most important issue related to RCW Management on National Forests in Florida is the expanded use of local criteria in establishing management techniques and requirements. While we realize that it is essential to develop a regional plan for RCW recovery, we also believe that a single, "across the board" approach is not capable of responding to conditions specific to individual forests. An excellent "case in point" in Florida is the Apalachicola National Forest where the recent RCW "Foraging Study" fails to support the universal standard of 6,350 stems in the foraging area. It is our opinion that the final version of the RCW DEIS must make a far stronger case for increased flexibility on a site specific basis.

Overall, our Association looks to Alternative E (Proposed Action) for RCW Management in the Southern National Forests - with the following list of modifications:

- 1) Costs - Based on previous experiences, such as the inability to fulfill mid-story control as outlined in the 1985 RCW Guidelines, we are concerned with the Forest Service's ability to obtain the necessary funds on a yearly basis, to carry out the RCW management plan as outlined, especially considering the current federal budget deficit. Without a full commitment from the upcoming Fiscal Year budgets, the Forest Service's efforts to recover the RCW will be impeded by its own lack of funds.

Response to Comments in Letter No. 111  
From: Philip Gornicki, Florida Forestry Association

Comment No.	Response
1.	Comment noted.
2.	Comment noted.
3.	Please see Response #113, Comment #4.
4.	Please see Response #33, Comment #8.
5.	Please see Response #37 et al., Comment #7.
6.	Comment noted.
7.	Please see Response #33, Comment #60.
8.	Comment noted.
9.	Please see Response #113, Comment 10.
10.	The FEIS provides comparisons based on 1994 dollars.
11.	Please see Response #197, Comment #6.
12.	Comment noted.
13.	Comment noted. Please see Response #113, Comment #10.
14.	Comment noted.



111

The Agency must make every effort to assure that cost estimates to manage for the RCW are complete and realistic. The public needs to see an accurate estimate of RCW recovery costs.

- 2) Habitat Management Areas (HMAs) - Our Association is pleased to see that the Forest Service emphasizes that an HMA is in fact a "Management Area" as opposed to a "set-aside".

We feel, however, that the RCW is being provided for in excess of its needs, primarily within the short term. In circumstances where the RCW population is low and where the time frame to achieve recovery is at least 25-30 years into the future, we recommend that the Forest Service reconsider the size of the identified HMA's and the specific Management Intensity Level (MIL) necessary.

While the DEIS briefly discusses the concept of a "sub-habitat management area", there is not enough detail on this. Considering the extent of HMAs on Florida's National Forests, this is especially crucial to us.

We recommend that the Forest Service allow for a less restrictive management area in portions of the HMA where it will be years before an expanded RCW population will use such portions.

Foraging - The Forest Service is still requiring what appears to be a foraging habitat which does not benefit the RCW. Studies (by Hooper and Lennartz) have suggested that red-cockaded woodpeckers are not sensitive to loss of foraging habitat except at low densities.

On the Florida Foraging Study - Of key importance is the current foraging study being considered in Florida on the Apalachicola National Forest. It is our understanding that the study has shown to-date, no relationships between measures of foraging habitat and clan fitness. While the study does not find the optimal number of stems, it is inappropriate for the agency to continue to apply the 6,350 stems guideline to the Apalachicola District of the Apalachicola National Forest. Although the study is specific to Apalachicola, it seems to cast considerable doubt on the guideline for application to other forests as well. A recently conducted "population trend survey of the RCW" also seems to confirm a rising RCW population on the Apalachicola District.

We recommend that the agency provide a range of foraging guidelines for individual forests to test as a result of the sound and valid options apparent in the Apalachicola study.

(3)

2/13-4 3)

(4)

2/13-4 3)



Mr. Joe Dabney  
March 18, 1994  
Page Three

- 4) Impact of Forest Service Management to Private Landowners -  
Management for RCW for National Forest lands extends to the need to  
recover the species as opposed to the private lands whereby the Endangered  
Species Act requires the avoidance of a "take" of an endangered species such  
as RCW. Clearly, the Forest Service should not add to any private land owner  
responsibilities in terms of increased habitat needs for RCW on public lands.

To avoid such circumstances, the Forest Service should not place any artificial  
cavities or provide augmentation within 3/4 mile of a private land boundary.

- 5) Clearcutting - Basing a decision on politics and not biology is the wrong  
decision. Even the Chief's June 4, 1992 policy on clearcutting did not seek to  
ban the use of clearcutting as a harvest method. The policy sought to clarify  
that "clearcutting is to be used only where it is essential to meet specific forest  
plan objectives and..." under certain circumstances. The Chief went on to  
describe those

The need to maintain the use of clearcutting has been supported by many  
professional organizations, and the Forest Service. For example, policy  
positions of the Southeastern Section of the Wildlife Society, and the Society of  
American Foresters, support the use of clearcutting as an appropriate means  
to accomplish forestry and wildlife objectives.

The Forest Service must review its decision with regard to clearcutting, and  
provide for more of this harvest method within MILs other than MIL 1. Even  
in MIL 1, the agency should make it clear that clearcutting will not adversely  
impact the RCW.

- 6) Irregular Shelterwood - Rotation - According to the DEIS, "the irregular  
shelterwood is an untested regeneration method..." (DEIS, Page 62). The use  
of untested systems should be of concern to the agency, especially when it will  
be applied to such a vast area.

We are concerned with the use of irregular shelterwood due to the potential  
adverse impacts to the RCW and productivity of the site. The potential for the  
regeneration to become the "mid-story" which would have to be controlled,  
presents its own set of problems and hazards to the RCW. The continual  
shading of a permanent overstory will hinder regeneration - especially in long  
leaf stands.

DEIS lacks the recognition that certain silvicultural practices can grow trees  
faster and produce heartwood quicker. The establishment of longer rotations  
as opposed to looking at silvicultural options for varying sites, unnecessarily  
restricts flexibility at the individual forest level.

Mr. Joe Dabney  
March 18, 1994  
Page Four

- 7) Prescribed Burning/Mid-story Control - We are concerned with the ability of the Forest Service to conduct the magnitude of acres to be prescribed burn each year. Our concerns extend to the financial and manpower aspects as well as to state smoke management limitations. The ability to conduct prescribed burning "when conditions permit" can be very limiting itself, based on the individual state. The importance of mid-story removal through prescribed burning is essential to RCW recovery.

Our Association also has concerns over observed pine mortality associated with growing season burns and the long-term implication for overall forest productivity.

- 8) Economic/Social Impacts - The DEIS fails to address the localized impacts on a forest by forest basis. It is impossible for the public to understand the true impacts of the DEIS since no information is provided for on a forest by forest basis. This information should be included in the Final EIS, especially since it is already available. This should include, by forest, the timber volumes, county payments, jobs and income impacted by each alternative. Florida is especially sensitive to this issue given the huge economic impact of current RCW management in places such as Liberty county.

The DEIS inappropriately calculates baseline numbers in Tables S-5 and S-6. In both tables, the "baseline" columns are in 1988-89 dollars and are shown as a constant figure over a 30-year period. By contrast, values generated by the "alternatives" are expressed based on higher prices attained during the 1992-1993 period. For an accurate comparison, dollars associated with the "baseline" and the "alternatives" should be expressed in the same constant dollars.

- 9) Wilderness - The DEIS inappropriately excludes Wilderness areas from the role of RCW recovery. In some forests, Wilderness areas represent a substantial opportunity for playing a role in RCW recovery. The Final EIS must address this role and provide for a management guide which would utilize Wilderness areas.

- 10) Longleaf Restoration - The DEIS looks to longleaf restoration to promote RCW recovery. This policy direction fails to recognize the ability of the RCW to use loblolly successfully and which also grows heartwood quicker than longleaf. The promotion of longleaf seems to hinge more on the "pre-settlement" conditions, as opposed to a biological RCW need.

Mr. Joe Dabney  
March 18, 1994  
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The Final EIS should allow for more flexibility in making such decisions rather than mandate longleaf restoration to longleaf sites. The DEIS fails to recognize that every acre that was once longleaf might not be best suited for longleaf today. Only site specific considerations can make such determinations.

- 11) Management Intensity Levels (MILs) - The initiative to recover the RCW species and to move from one MIL to another is critical. However, our Association does express concern with the ability of the Forest Service to change MIL management on the ground and to resume timber sale programs at higher levels in the future, as provided for in conjunction with expansion and ultimate recovery of the RCW. An MIL 1 should allow for more of a timber sale program than an MIL 2 or 3 or 4. However, circumstances such as Florida's Apalachicola National Forest, which is a recovered population and is designated as an MIL 1, resulted in just the opposite...a very limited timber sale program.

- 12) Monitoring - Monitoring is key to making sure that the recovery plan is working. The agency should address a time frame under which it expects to reach recovery. In addition, interim time frames should be identified with specific objectives.

The Forest Service should make sure that the monitoring program will in fact, be statistically and biologically acceptable. From there, it will be important that funding is provided and that monitoring is carried out consistently throughout all forests.

In conclusion, the Florida Forestry Association is appreciative of this opportunity to provide comments on the RCW DEIS. It is our hope that the input we provided will lead to a greater degree of flexibility afforded individual National Forests in the management of our natural resources for the RCW.

Sincerely,

*Philip P. Gornicki*

Philip P. Gornicki  
Forester - Environmental Issues

PPG:mlj

Steve Emerson  
478 453 3356

Steve Emerson  
478 453 3356  
Fax 478 453 3353

**Weyerhaeuser**

Mr. Joe Dabney  
R.C.W., E.I.S. Team Leader  
1720 Peachtree Road N.W., Room 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

I am writing as a concerned citizen from the State of Mississippi. I have reviewed the proposed Recovery Plan for the Red Cockaded Woodpecker and I find it unacceptable. The preferred alternative appears to be based on the need of a single species.

✓ I would propose that forest management plans be based on multiple-use and managed on a landscape basis to provide for all species. The mix of the whole is more important than a management plan directed at a single species. At this time Alternative "E" would be the choice that I would recommend, with the following changes:

1. Reduce recovery populations to more realistic levels.
2. Rotation ages should vary across the landscape. Some should be 70 to 100 years. But, some should be much shorter. Also, should provide for some stands of mixed pine and hardwood.
3. Foraging habitat could be managed at younger ages.
4. Forest management practices that were used in South Carolina and Florida should be considered as options. The R.C.W. populations are stable in these forest and we need to use what we have learned in the past.
5. Make commitments as to the volumes of wood that will be harvested. Wood harvested from national forest lands in MS is an important part of our economy. If there is any impact that will reduce harvest levels, it needs to be published accurately.

I appreciate the opportunity to comment on the R.C.W. Recovery Plan and hope that all aspects are considered in making the final decision.

Sincerely,



Steve Emerson  
MS Registered Forester #1306

Steve Emerson  
Route 184-D  
Socorro, Mississippi 39356  
Tel 601 478 4533  
Fax 601 478 3513

*Steve Emerson*  
3/21/89

Response to Comments in Letter No. 112

From: Steve Emerson, Weyerhaeuser

Response

Comment No.

1. Recovery populations of RCW are based on the information provided in the USDI Fish and Wildlife Service's 1985 RCW Recovery Plan.
2. In the selected alternative, rotation ages will vary with the landscape and the species of pine that may be found in an area. There will be a mix of pine and hardwood in the RMAs. There will be drainages or streams that contain hardwoods which will be left if they do not detract from the needs for RCW. Individual stands will contain hardwoods as well.
3. Latest research on this topic does not agree with your statement.
4. Forest management experience from Florida and South Carolina has been included. Some of the ID Team members have worked in those forests.
5. Projected volumes of timber for the National Forests in Mississippi will be displayed when they revise or amend their Forest Land and Resource Management plan to implement the direction of this plan.



From: Ardis Almond, Almond Bros. Lumber & Supply, Inc.

Response	Comment No.

Comment noted.

2. The management direction for the Red-cockaded Woodpecker (RCW) that is to be established by this Environmental Impact Statement (FEIS) is intended to revise the Regional Wildlife Habitat Management Handbook, amend the Southern Regional Guide and eventually become incorporated into affected Forest Plans. Direction given in these documents are intended to be programmatic and recognize that there may be site-specific situations where this direction may require modification. Regional direction for the management of the RCW is meant to provide and maintain uniformity of implementation regionwide. Modifications to this direction is allowed at the Forest and site level with concurrence of the U.S. Fish and Wildlife Service.

3. Comment noted. Funding for RCW management activities is expected from a combination of appropriated dollars and money generated from the sale of timber (K-V related sources).

4. The tentative RCW Habitat Management Areas (HMA) described in Appendix D of the FRIS are generally based upon the distribution of RCW cluster sites known to occur in 1986. They provide an area committed to the long-term management and recovery of the RCW. Healthy RCW populations require relatively large contiguous blocks of suitable habitat to ensure proper spatial arrangement of RCW groups. Large HMAs provide connected habitat for isolated subpopulations. The sub-HMA concept and the pine restoration strategy provide some flexibility for managing portions of the HMA for the long-term while not adversely affecting the immediate future of the RCW.

5. The foraging criteria for RCW incorporated into the FBIS were developed by the U.S. Fish and Wildlife Service in 1989. They are based upon three studies conducted on RCW populations in South Carolina. These criteria were developed to cover the entire range of the RCW. The FBIS encourages individual Foresters to pursue studies in consultation with the U.S. Fish and Wildlife Service which may establish new foraging requirements for specific areas/populations.

113  
Re RCW  
3/21/94

**Almond Bros. Lumber & Supply, Inc.**  
Manufacturers Of Kiln Dried Southern Yellow Pine Lumber  
Route 1, Box 4 Phone 318-932-4041  
Coushatta, Louisiana 71019

March 14, 1994

Mr. Joseph M. Dabney, RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Rd. NW, Room 718 N  
Atlanta, GA 30367-9120

Dear Mr. Dabney:

I would like to comment on the Forest Service Draft Environmental Impact Statement for RCW Management.

Our company is a 5th generation sawmill operation. If we, as an industry, were not stewards of the environment, we would not still have the forest resource that has provided for our company for 130 years. We are an export sawmill that produces about 20,000,000 board feet of high grade lumber annually for customers all over the world. We use logs from a 120 mile radius. This includes logs from the National Forests of Louisiana, Arkansas, and Texas.

We have worked closely with the Southeastern Lumber Manufacturers Association, the Southern Timber Purchasers Council, the Louisiana Forestry Association, and local manufacturers in studying this proposal. We agree with the detailed comments that you will receive from these organizations, but we offer below a brief summary of our findings:

Alternative B... requires modifications that respond to the need for site specific flexibility. Without site specificity, too often you will find yourself trying to pound the proverbially square peg in the round hole. Too much government is like that now.

3  
a long time before this plan will probably be put into reverse evaluation on

4 We believe that the size of the Habitat Management Areas are much bigger than needed in the near future. These HMAs can be increased as necessary as the populations of the bird increases.





5 Also, your foraging habitat guidelines are in excess of what is needed and not enough study has been completed to implement them. We suggest that the individual forest be allowed to test a range of foraging options keyed to their individual forests.

6 Since the Endangered Species Act requires the avoidance of a "take" of an endangered species on private land, the Forest Service should not create any "manufactured" problems for private landowners by placing artificial cavities or provide augmentation within 3/4 mile of a private land boundary.

7 We, as citizens, are tired of "politically correct" decisions. It is time to base decisions such as clearcutting on science and not on what is popular at the time. You know that both the Forest Service Biologists and many professional organizations have supported clearcutting as an appropriate means to accomplish forestry and wildlife objectives. The Forest Service should have the courage to admit that clearcutting is a reasonable part of management.

8 The DEIS itself states that the irregular shelterwood is an untested regeneration method. The balance between regeneration and mid-story growth would almost certainly have a detrimental effect on the RCW and would have severe impacts on productivity of the site.

9 The decreasing size of the agency, weather conditions, and financial constraints will probably result in inadequate implementation of promised prescribed burning and mid-story control.

10 The DEIS fails to address the localized economic and social impacts on a forest by forest basis. This should be listed in the final EIS and should include, by forest, the timber volumes, quality payments, jobs, and income impacted by the alternative.

11 The DEIS does not include Wilderness Areas in the recovery of the RCW. These areas play a significant role in the recovery of the bird and should be included in the final EIS.

12 Remember, not only the habitat of the birds are at stake but also the livelihoods of generations of people like ourselves. We have depended on these forests to provide a way of life in the past and will depend on them in the future.

Please stay in touch with me about your decisions.

Sincerely,



Ardis Almond

6. Comment noted. The placement of artificial cavities and the translocation of RCWs will be determined by the proximity to existing RCW groups, the availability of existing foraging habitat, and other site-specific situations. The distance to private land would be an issue which may best be addressed at the local level during the public involvement process at the project implementation stage.

7. The use of clearcutting as a regeneration harvest method continues to be an issue at the national, regional and local levels. In most cases, the use of the seed-tree or shelterwood harvest methods will ensure the regeneration of the future stand while maintaining some level of RCW habitat capability. While the use of clearcutting is reduced in most of the alternatives described in the FEIS; with the exception of Alternative D, it is still allowed under certain circumstances such as pine restoration and damaged or understocked stands.

8. Comment noted. The FEIS recognizes that irregular shelterwood is an untested regeneration method for loblolly, shortleaf and slash pine. It also states that it is uncertain whether or not this method will supply a steady flow of RCW habitat. Depending on the site, very high densities of seedlings may occur under this silvicultural method. Various techniques are available for reducing these high densities; but in some cases they may not achieve the desired levels or may be cost prohibitive. This like all other activities prescribed in the final RCW management direction will have to be monitored to determine their efficacy towards producing the desired vegetation results.

9. Comment noted. The use of prescribed fire is essential to maintaining RCW habitat by controlling the woody midstory and improving the herbaceous understory. Funding for prescribed burning activities is expected from a combination of appropriated and K-V related sources. Where this does not occur, the use of herbicides may be used under certain circumstances and restrictions. Site-specific information will dictate which technique(s) will be most successful.

10. Chapter 3 of the FEIS discusses the economic affects of each of the described alternatives on the 72 counties and parishes within the National Forests with RCW. From these 72, it further identified four counties and one parish as being most dependent on National Forest timber for additional analysis. Economic impacts will be incurred in areas dependent on timber-related jobs and income and reliant on payments to the counties. However, the degree of impact will decrease with time as stands currently in the 0-30 age class grow older. The preferred alternative also provides opportunities to lessen the short-term impact through pine restoration and use of the sub-HWA strategy.

This will allow the forest manager to move towards a balanced age class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat while providing income to rural communities.

11. The FEIS process for delineating the HWA boundary excludes wilderness which does not allow the essential management practices, such as prescribed burning and midstory control, to occur. However, the preferred alternative encourages all forests having RCW groups within a wilderness, especially those which are predominantly longleaf pine, to develop wilderness plans which allow these management practices.

12. Comment noted.

R. C. 10 E. 15 S. 22 N. 22 W. 7.50  
6000 505 170 22

Hello Joseph in Pottery.

Mr. James B. Hutchens, Jr.  
605 E. Meeting St.  
Morganton, NC 28655-3404

I feel like artificial camities  
should be the color of the tree bark.  
And, it would be like having a tree  
cut in case someone tries to  
remove it or: shots would do it harm.  
Please get into the will someone  
and try to do an investigation.  
Superior district on the mountains.  
If people try to have  
your own of school!

I feel truck drivers and teachers  
are two of the smartest people in  
country too. Truck drivers get to sit  
about. Teachers have two or three  
months a year vacation.

If schools run year around,  
many, on approval, teachers will go  
out of that job into higher paying  
jobs. This would leave dinner  
teachers to fill their vacancies.

The too more full would be  
about up and into the air! A  
school bus stops, ok? Notice how  
many other cars, trucks stop.  
and for how long and how often?!

Now a day about this.  
well, I feel children need time  
left. If they were in many stages  
in life, disabled, etc, have they  
handes separate? See construction

a must, part of life. Then, too they  
nature. ~~...that~~ they may not have  
in the middle spare time.

I otherwise, I feel of no spare  
time while growing up they shall  
be or when, prove to me work  
boilers. Then too, they may all be  
under gears of stress. This  
could have an impact on others also.

If you find, you cannot do any  
thing please pass it, this letter on  
up to Washington, OK? Thanks.  
There may be other reasons also.  
Also, what about jobs or related  
jobs as yours? People may for  
get comparing the forest set.

T U R I S M jobs may be lost,  
maybe any rich go to places  
like yellow stone, grand canyon,  
etc but if children are to stay  
in school I feel lots of jobs are  
going to be lost. Struggle now!  
We lost at least 100,000 to some  
degree. As something.



1402 Hawn Ave.  
Shreveport, LA 71107

Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peach Tree Rd NW Rm 718N  
Atlanta, Ga 30367  
March 16, 1994

Dear Mr. Dabney,

Thank you for giving the Louisiana Pine Straw Association the opportunity to review the Draft Environmental Impact Statement for the Management of the Red Cockaded Woodpecker and Its Habitat on National Forests in the Southern Region.

The only reference to pine straw harvesting found in the statement was under the section titled Motorized, Heavy Equipment Use. Concentrated human use and it prohibited activity within clusters, recruitment, and replacement stands. It appears as though all five alternatives list pine straw harvesting as a prohibited activity.

We feel as though someone has missed the opportunity to utilize the pine straw harvesting industry as a tool to help with management for the Red Cockaded woodpecker. Forest management needs of the Red Cockaded woodpecker appear to be very similar to the advantageous conditions for pine straw harvesting. These conditions are mature open Longleaf pine stand with little or no understory or hardwoods.

The harvesting of pine straw is basically a fall and winter activity, therefore it would not interfere with the March 1-July 31 nesting season. Also, any site preparation for pine straw harvesting, for example bush hogging and summer burn, would best be done in August or September before the straw falls. Once again, the nesting season would not be interfered with. Relatively small tractors, hayrakers, and haybales are used to harvest pine straw, and would not be classified as heavy equipment. A work crew of less than six people would be used to harvest straw or remove understory, and would only be in a cluster site for twenty-four hours or less, and therefore, should not cause a disturbance problem to the Red Cockaded woodpecker. If it is determined that minimal noise for twenty-four hours or less, one or two times a year, outside the nesting season, will negatively impact the recovery of the Red Cockaded woodpecker, then every National Forest should be declared as a wilderness area and all other users of the National Forest should be forgotten.

We sincerely hope your environmental impact statement will be revised to remove pine straw harvesting as a prohibited activity. Furthermore, we would like to see a section developed that would address the positive impacts of utilizing an industry that can and is willing to help manage the pine forest for the benefit of the industry and the Red Cockaded woodpecker.

The Louisiana Pine Straw Association welcomes the opportunity to work with the Kisatchie National Forest in Louisiana to establish best management practices for pine straw raking and Red Cockaded woodpecker management. We sincerely hope that the final environmental impact statement does not close all doors to our desire to help.

Please let us know if we can help in assuring that the National Forest will be managed for the user as well as the Red Cockaded woodpecker.

Sincerely,

*Harvey Heintz*  
Harvey Heintz  
President

Response to Comments in Letter No. 115

From: Harvey Heintz, President Louisiana Pine Straw Association

Comment No. Response

1. The intent of the prohibitions on motorized, heavy equipment, and concentrated use areas is to avoid unnecessary disturbance and damage to cavity trees and potential cavity trees. Gathering and raking of pine straw might be permissible, depending on the size of the equipment used and the season of the year. We would like to note that clusters, recruitment and replacement stands are relatively small areas of the Forest and large areas of pine are still available for this activity. Baling and storage operations would have to be located outside of clusters, replacement and recruitment stands.
2. Comment noted.
3. Comment noted.
4. Comment noted.



File RCW 3/21/94 (116)



310 Kings Daughters Drive #7  
Frankfort, Kentucky 40601  
(502) 875-3136  
FAX (502) 875-0095

March 17, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm 718 N  
Atlanta, GA 30367-9102

Dear Mr. Dabney:

The Kentucky Forest Industries Association (KFIA) appreciates this opportunity to respond to the Draft Environmental Impact Statement for Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region (RCW DEIS).

After careful review and discussions with members in Kentucky, the association provides the following comments on the DEIS. Our position demands modification to Alternative E which appropriately represents the need for site specific flexibility. This position focuses on the Draft EIS which recognizes the potential for flexibility in applying management techniques, on a forest by forest level. While it is essential to take a regional look at the recovery management techniques for RCW, it must be emphasized that an across the board solution is not capable of responding to specific conditions.

Without serious consideration and changes to the Final EIS to reflect such modifications, the agency's RCW Management Plan will be inadequate and ripe for appeal. We are convinced that recovery of the RCW can be accomplished, in the long term, with an even more site specific management approach as we suggested. Factors which should be considered at the forest level include (1) the importance of a particular RCW population to the overall survival of the RCW; (2) the RCW population trend in that forest; and (3) other local conditions. Amendments and revisions of forest plans can achieve this, if the regional guide (RCW Draft EIS) provides for sufficient flexibility.

Cordially yours,

*James H. Lee*  
James H. Lee  
Executive Director

"Serving the Industry for over 25 years"

Response to Comments in Letter No. 116

From: James H. Lee, Kentucky Forest Industries Association

Comment No. Response

1. This long term plan is a programmatic document which provides general guidance to each affected National Forest. Each will revise or amend their Forest Land and Resource Management Plan according existing conditions.
2. The 1985 RCW Recovery Plan designates which populations are most important.
3. RMA delineation and Management Intensity Level guidelines in the selected alternative will be used in accordance with RCW population trends in each Forest.



## Louisiana Department of Agriculture & Forestry

Office of Forestry  
Post Office Box 1628  
Baton Rouge, Louisiana  
70821-1628  
(504) 925-4500  
FAX (504) 922-1356

BOB ODOM  
COMMISSIONER

March 17, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Road, NW, Room 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

The latest forest survey in 1991 indicated that of all the midsouth states, Louisiana has the highest removal-to-growth ratio for softwoods. Whether or not this increase in the amount of softwood harvested will continue into the future is uncertain. There are many varied interests competing for Louisiana's forest resource.

1 The proposed reduction in harvest levels on the National Forest of the South and in particular the Kisatchie National Forest in Louisiana due to the RCW will have a significant impact on the economy of an area. Reducing harvest levels by 50% in comparison to pre-1989 RCW interim guidelines will result in an estimated \$35 to \$40 million lost to the economy of Central and North Louisiana.

2 Removals from heavily cut private lands cannot keep pace with the continued reduction in the quantity and/or availability of Forest Service timber. Forest industry has difficulty in planning expansion of wood procuring facilities due to the uncertainty of Forest Service timber.

I personally feel that Alternative B would have the least impact on harvest levels and maintain RCW habitat.

Sincerely,  
*Paul D. Frey*

PAUL D. FREY - STATE FORESTER

dkb

BILLY W. WEAVER, LFC Chairman  
Lounge

EDE MYERS  
Hoops

SAMUEL Y. PRUITT  
Late Chairs

DR. STANLEY B. CARPENTER  
Baton Rouge

BURTON D. WEAVER, JR. Vice Chairman  
Flora

O. BRYANT LEWIS  
Hennepville

JOEL L. HERRING  
Baton Rouge

All facilities, programs and services of the Louisiana Department of Agriculture and Forestry are available to all persons. Discrimination is prohibited and should be reported to the Commissioner of Agriculture and Forestry.

"Equal Opportunity in Employment and Services"

Response to Comments in Letter No. 117

From: Paul D. Frey, Louisiana Dept. of Agriculture & Forestry

Comment No. Response

1. See Response #27, Comment #1.
2. Comment noted.

Gene A Sirnan  
RCW Els Team Leader, U S Forest Service  
1720 Peachtree Road N W Room 718N  
Atlanta Ga 30367

To whom it may concern:

I live in Wilkinson County Mississippi and write a column for the weekly Woodville Republican, published at Woodville, Miss 39669. Having been out of the area for a few days, I went through accumulated copies of the Jackson-based Clarion Ledger and found the Forest Service article written by, I believe, Gene A Sirnan. By mail yesterday - March 18, I sent your article to the paid paper with the request that Editor Andrew Lewis publish name and address under separate headline in order to give interested persons a chance to write. However, the paper does not publish until Wednesday and this time limit of March 25 would discourage writing.

Be that as it may, I'm am writing you today in order to ascertain you get the message from Wilkinson County, Miss. If you wish a copy of the column I submitted to the paper regarding Forestry matters, it will be available either directly from me or from the Editor. In Wilkinson County, I and many others are appalled, confused and - yes - hurt while witnessing what is happening to our once primeval Forest. Even Homochitto National Forest, the pride of our area, is reduced to meager saplings and pine bushes. Some areas have been clean cut, leaving bare earth which will most certainly result in erosion. Certainly, we have Forest Rangers whose responsibility is that of being certain timber is cut selectively, and enough growth left to ensure continuing growth and selective cutting. Some time ago I've complained bitterly concerning the things that were happening in the forest; indeed, I have had a running verbal battle in Woodville paper with one Al Tolar who insisted that the practices used in timber were normal. I disagree and that is an understatement. I have seen television presentations - I believe that would be on C Span - sometime ago. On the program, faceless Forest Rangers said, in effect, that the matter was "out of their hands."

I'm sure you are well aware that Japan is paying highly inflated prices for our precious natural resources. In closing, I wonder why the Forestry service has not looked into this matter long before this eleventh hour. There is little point in "locking the barn door after the horses are stolen"

Sincerely, Ada Smith

Ada Ashley Smith  
10995 HWY 563  
Crosby Miss 39633 tel # (601) 639 4879

Response to Comments in Letter No. 118

From: Ada Smith

Comment No. Response

1. Comment noted.

3-18-94

3/21/94

Per ACW

119

Joseph M Dabney  
RCW EIS Team  
US Forest Service  
1720 Peachtree Rd. NW, Rm 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

Following are my comments on the Draft Environmental Impact Statement for the management of the Red-cockaded woodpecker and its habitat on National Forests in the southern Region.

### General Comments:

1. Implicit in this EIS is the determination to perpetuate clear cutting in about 15% of the Southern National Forests that is about 2 million acres. Clear cutting and its variants should not be allowed. Only selective cutting and uneven aged management should be used.

a. The EIS dwells on the supposed inability of longleaf pine to maintain a stand without intensive management (e.g. longleaf pine must be started from a cleared seedling). I grow in a longleaf pine stand. The trees will only grow in an even aged stand. I don't understand how the magnificent longleaf pine forests of the past managed to survive without someone to clearcut and replant periodically.

3. In several places (e.g. page 85) it says that "Regeneration patch size must average 25 acres, or less, within the 3/4-mile radius circles". Does this mean that one huge patch and a lot of little ones are acceptable?

If clear cutting is done, patch size should never exceed 25 acres.

4. Construction of new recreational facilities should never be done in red-cockaded woodpecker HMA's.

4 . 2 . 1

Response to Comments in Letter No. 119

From: Le. A. Reitan

Comment No.

Response

1. Comment noted. Because of the variety of pine species occurring across the region and the variability of the sites on which they occur, it is necessary to allow the use of a variety of silvicultural methods in order to produce and maintain a continuous flow of suitable RCW habitat through time. The selected alternative of the FEIS allows for both even-age and uneven-age management to occur within RCW Habitat Management Area (HMA). Depending on the Management Intensity Level and the desired future condition of a particular HMA, a variety of regeneration harvest cutting methods are also available. The extent of a particular silvicultural system and the availability and amount of a particular harvest cutting method will be determined at the Forest and site levels based upon the needs of the RCW, the local issues and objectives, and other site characteristics.

The use of clearcutting as a regeneration harvest method continues to be an issue at the national, regional and local levels. In most cases, the use of the seed-tree or shelterwood harvest methods will ensure the regeneration of the future stand while maintaining some level of RCW habitat capability. While the use of clearcutting is greatly reduced in most of the alternatives described in the FEIS, with the exception of Alternative B, it is still allowed under certain circumstances such as pine restoration and in the regeneration of damaged or understocked stands.

2. Intolerant, early successional species which includes longleaf pine survive, grow and develop best when free of competition and grown in full sunlight (Baker 1987; Baker and Balmer 1983; Boyer and White 1990; Burns 1983; Zedaker et al. 1987). Longleaf pine is especially intolerant of competition from any source such as overtopping trees, including patent trees (Boyer 1993).

Where longleaf pine is the species of concern, the selected alternative of the FEIS only allows the use of clearcutting in two specific instances. These are the regeneration of understocked or damaged stands and the restoration of off-site pines back to longleaf. Restoration harvests may occur as clearcuts where few if any longleaf pine exist in the stands to be regenerated. All existing longleaf pine trees will be



off the road vehicles and machinery should not be allowed in red-cockaded woodpecker HMA's.

6. Even aged management should not be used. The irregular shelterwood method should not be used. It is basically another way to clearcut. Also, the few trees left standing are very susceptible to wind and lightning.

Lee A. Pester

protected during restoration harvests. The selected alternative also allows the use of group selection as an uneven-aged harvest cutting method.

3. Comment noted. The selected alternative, in the FEIS restricts, <sup>regulation on</sup> the regeneration patch size to 40 acres in MILs 1 and 2 and to 25 acres in MILs 3 and 4. ~~The only exception to this may be a restoration harvest beyond 1.9 miles from an active cluster where potential adverse effects on RCW habitat and movements are limited. Maximum regeneration patch size in these instances would be determined during the revisions of individual forest land and resource management plans.~~

4. Comment noted. Disturbance during the nesting season may be critical to the reproductive success of individual RCW groups, especially those which are not accustomed to human activity. Therefore, the selected alternative prohibits the construction of concentrated human use facilities such as trail-heads, off-road vehicle trails and campsites within cluster sites, recruitment stands or replacement stands. Construction of recreational facilities outside of these areas is compatible with RCW management so long as any removal of pines does not affect foraging habitat. There is no evidence that disturbance of foraging RCW outside the cluster sites has any effect on population levels.

5. Comment noted. While the selected alternative does restrict the construction of off-road vehicle trails within cluster sites, recruitment stands and replacement stands, it does not restrict or limit off-road vehicle use throughout the remainder of the HMA.

6. Please see Letter #119, Comment #1.

7. The retention of overstory trees during shelterwood and irregular shelterwood harvests minimizes the effects of fragmentation and provides suitable cavity trees for that particular stand in the future. In a recovered population (Mil 1), these factors become less of a concern than in smaller populations at risk of extirpation.

8. In many instances, the encroachment of midstory vegetation has resulted in the abandonment of Red-cockaded Woodpecker (RCW) cluster sites and is recognized as one of the primary factors leading to RCW population declines. Controlling woody midstory species and thinning pine stands are essential activities in the production and maintenance of quality RCW nesting and foraging habitat. All alternatives described in the FEIS encourage these activities and recognize that they are the primary silvicultural activities needed to create the open park-like stands preferred by RCW. As with any habitat improvement practice, there are risks involved; but in a large majority of the cases, the indirect effects of improving the overall habitat quality of these areas will benefit the RCW. Based on site-specific



### Specific Comments - #7

1. Page 8 - The irregular shelterwood method would retain only 6 trees per acre in MIL 1. Trees would be about 85 feet apart.

If irregular shelterwood is used, more trees should be left.

2. Page 8 - Midstory Control

It seems to me that woodpeckers should be able to fly around midstory vegetation on their way to foraging trees.

3. Page 23 - Use of Heavy Equipment  
 Ways have to be found to manage the forest with less impact on the environment. Small equipment should be used. Huger tree harvesting machines should not be allowed.

4. Page 24 - Road Work  
 Road work should be avoided if possible.

5. Page 218 - Clearing for Nontimber Management Purposes  
 New initiatives for any of these activities should not be allowed.

6. Page 172 - Southern pine beetle suppression  
 Cutting of trees to prevent "a threat to public safety" is allowed.

On rare occasions cutting may be necessary to protect the public but this loophole could be abused. There are some dangers in a forest. People going into the forest have to realize this and be careful.

7. Page 180 - Off-site pines  
 stands of off-site pines should be selectively replaced as the off-site trees die. If the area is clearcut it will have no forage for at least 20 years and no next tree for at least 75 years.  
 Lisa A. Rubin

conditions, the amount of midstory vegetation to be removed or the basal area of pine to be cut at one time can vary.

9. Comment noted. The selection of which type of equipment to be used will occur at the local level and is expected to take into consideration all site characteristics which may be affected by heavy equipment. Soils will vary in their susceptibility to compaction, rutting and erosion.

10. Comment noted. Existing road maintenance and management has the potential of creating an impact to the RCW on an individual site basis. The selected alternative provides direction to minimize or avoid adverse effects to the RCW during these activities.

11. Under the selected alternative, clearing for nontimber purposes can only occur if it will not affect the overall capability of the HMA to support its identified population goal. Site-specific analysis will occur to evaluate the potential impacts to RCW nesting, foraging or movements. Clearings within 1/4 mile of an active cluster site will not occur unless they are beyond the control of the Federal Government, such as outstanding mineral rights.

12. The cutting of standing dead trees to prevent a threat to public safety is an issue that will be resolved at the local level.

13. The restoration of pines, such as longleaf, which are preferred by the RCW is recognized as an essential element in the long term strategy to recover this bird. The selected alternative encourages pine restoration where it will provide a long term benefit to the RCW and not create short term adverse effects. It also protects all relicts and residuals of the species being restored during the restoration harvests. These would provide future potential cavity trees.

14. The selected alternative does allow the use of clearcutting for regenerating understocked or damaged stands under certain circumstances. It also provides direction for the retention of some existing overstory trees. The number of trees to be retained will vary depending on the MIL and desired species for the particular site.

15. As an individual RCW population grows and approaches recovery or its identified population goal, the specific need for fragmentation controls beyond that which occurs under an extended rotation diminishes. The need to provide the highest levels of potential cavity trees also diminishes when a population is declared recovered or achieves its goal. For these reasons, the selected alternative allows the use of seed-tree and standard shelterwood harvests in HMAs with populations with a moderate to low risk of extirpation. Seed-tree harvests are only allowed in HMAs with a recovered population or in those which have achieved and maintained their identified population goal for five years (MIL 1). The retention of six trees per acre is optional in

~~understocked~~  
8. Page 185 - understocked or damaged stands  
It doesn't make sense to clearcut  
an area where the problem is not

(14) enough trees. If the area is clearcut  
it will provide no forage for at least  
20 years and no nest trees for at  
least 75 years.

Understocked areas should be  
selectively replanted.

9. Page 186 - Even-aged silviculture - seed tree  
or shelterwood.

(15) These methods should not be allowed.

10. Page 186 - Irregular shelterwood

(16) This looks like another way to  
clearcut and should not be allowed.

11. Page 275 - Cumulative Effects

(17) It says that with even aged regeneration  
and rotations the shortest recovery  
period would be 70 years.

Thinning and burning operations are  
not counted when that is stated.

Sincerely Yours,

Lee A. Reitan

Joe A. Reitan

511 Williamsburg Cir.  
Friendswood, TX 77546

713-489-4369

these HMA's. Standard shelterwood harvests are only allowed in  
MILs 1 and 2. In MIL 2, six trees per acre must be retained  
during the final harvest.

16. Please see Letter #119, Comment #1.

17. The portion of the document referred to is addressing the  
cumulative effects of regeneration on an individual stand. The  
cumulative effects of thinning and prescribed burning are  
disclosed elsewhere in Chapter 3.

RCW EIS team leader  
U.S. Forest Service

I am opposed to the Forest Service moving the red-cockaded woodpecker to any area of Mississippi. If the woodpeckers, which are on the endangered species list, are released on National Forest land they could move off it onto private land making it virtually worthless.

A main source of income for Mississippi, both public and private, is timber. This could destroy the economy of Mississippi. Does this sound like the story of the spotted owl on the West Coast?

Please stop this now. I would like to hear from you.

Sincerely,

Risa Barton

Risa Barton

Rt 2 Box 183

Uniontown Mo 63012

See RCW

133

3/2/94

Response to Comments in Letter No. 133, 136, 137, 142

From: Risa Barton, L. M. Breland, Erlene L. Breland, Billy R. Barton, Jr.

(Only the Barton letter (#133) is reprinted here. Others were identical in content and are responded to once.)

Comment No. Response

1. The U.S. Forest Service is charged with responsibilities under the Endangered Species Act and very specific responsibilities with regard to the U.S. Fish and Wildlife Service Red-cockaded Woodpecker Recovery Plan. The Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. Two of the areas identified occur on National Forest Land within Mississippi.

The Forest Service and the U.S. Fish and Wildlife Service agree that the translocation of RCW from one location to another is critical to the viability and eventual recovery of existing small populations. Though the possibilities of RCWs moving from National Forest lands to private lands does exist, the likelihood of this occurring is considered to be remote. Most private lands do not provide the specific habitat requirements needed to support RCWs.

Chapter 3 of the FEIS discusses the economic affects of each of the described alternatives on the 72 counties and parishes within the National Forests with RCW. From these 72, it further identified four counties and one parish as being most dependent on National Forest timber for additional analysis. Economic impacts will be incurred in areas dependent on timber-related jobs and income and reliant on payments to the counties. However, the degree of impact will decrease with time as stands currently in the 0-30 age class grow older. The selected alternative also provides opportunities to lessen the short-term impact through pine restoration and use of the sub-HMA strategy. This will allow the forest manager to move towards a balanced age class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat while providing income to rural communities.

134

Re LCU  
3/21/94

W

March 10, 1994

U. S. Forest Service  
1720 Peachtree Road N.W.  
Room 718 N  
Atlanta, Georgia 30367

Re: Relocation of red-cockaded  
woodpecker colonies from  
Florida to Mississippi

Gentlemen:

As a citizen of Southwest Mississippi, I would like to go on record as opposing the relocation of colonies of red-cockaded woodpeckers from Florida to Mississippi. As we are all concerned about the endangered species of our county, this proposed relocation of red-cockaded woodpeckers would have a devastating effect to the economic base of Southwest Mississippi.

Therefore, I would request that the proposal for the relocation of colonies of red-cockaded woodpeckers from Florida to Mississippi be terminated.

If you have any questions about this matter, please feel free to contact me.

Yours very truly,

Mike Daughdrill  
Mike Daughdrill

Disk 57-CF  
USFOREST.LTR

Response to Comments in Letter No. 134, 135, 138, 140, 141

From: Mike Daughdrill, Henry W. Darden Jr., Bill Crawford, Carol Smith,  
Louis Crawford

(Only the Daughdrill letter (#134) is reprinted here. Others were identical in content and are responded to once.)

Comment No.

Response

1. Please see Letter #133, Comment #1.

WILKERSON & CRAWFORD

ATTORNEYS AT LAW

JAMES E. WILKERSON, JR. (1990)  
DAVID S. CRAWFORD  
SAMUEL B. SODERBY

128 ROYAL OAK STREET  
P.O. BOX 101  
WOODVILLE, MS 39669

TELEPHONE  
(601) 888-3112  
TELECOPIER  
(601) 888-3104

March 10, 1994

The U. S. Forest Service  
1720 Peachtree Road  
N. W. Room 718 N  
Atlanta, Georgia 30367

Re: U.S. Forest Service proposed  
relocated of Red-Capped Woodpeckers  
from Florida to Mississippi.

Gentlemen:

You will find enclosed herein a photocopy of the  
Resolution adopted by the Wilkinson County, Mississippi  
Board of Supervisors on March 7, 1994.

If you have any questions about this matter, please  
feel free to contact me.

Yours very truly,

WILKERSON & CRAWFORD

David S. Crawford

DSC:cf  
Enclosure

disk 57-cf  
BOS22

Response to Comments in Letter No. 139

From: David S. Crawford, Wilkerson & Crawford

Comment No. Response

1. Please see Letter #133, Comment #1.



3/16/94

ORDER

WHEREAS, it has come to the attention of the Wilkinson County Board of Supervisors that the U. S. Forest Service has issued an environmental impact statement for the management of Red-Cockaded Woodpeckers and their habitat on the National Forest in the Southern United States, and, whereas, as a portion of said plan, it has been set out that 329,083 acres of the Beinville, DeSoto and Homochitto National Forests would possibly be set aside for the relocating of Red-Cockaded Woodpecker colonies from Florida to Mississippi; and,

WHEREAS, since very little, if any harvesting would be permitted for the next 10 to 30 years on the timberlands affected; and,

WHEREAS, because of the detrimental economic impact of the relocation of the colonies of Red-Cockaded Woodpeckers from Florida to Mississippi, the Board of Supervisors, upon motion of Venton McNabb, Jr. and second of W. G. Johnson, unanimously resolved that the Wilkinson County Board of Supervisors oppose the relocation of Red-Cockaded Woodpecker Colonies from Florida to Mississippi.

SO RESOLVED, this the 7th day of March, A. D., 1994.

ATTEST:

Venton A. McNabb, Jr.,  
President, Wilkinson County  
Board of Supervisors

Clerk

Attest 3/16/94



SOUTHEASTERN LUMBER  
MANUFACTURERS ASSOCIATION, INC.

March 18, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road NW, Room 718 N  
Atlanta, GA 30367-9102

Dear Mr. Dabney:

The Southeastern Lumber Manufacturers Association (SLMA) appreciates this opportunity to express its interest and concerns with the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region (DEIS). A trade association, SLMA represents the interests of independent lumber manufacturers. These manufacturers depend on an even-flow and reliable supply of public and private timber to operate. We are very concerned that the DEIS does not adequately address all the options for management of the RCW nor the full effects this management direction will have on the forest products industry.

**FLEXIBILITY**

It is extremely important that flexibility in all aspects of the plan are reinforced in the Final Environmental Impact Statement. Flexibility applies not only to what level that decisions are made, it includes a range of alternatives that can be used to satisfy requirements. Each section of the DEIS contains opportunities to advance the importance of flexibility in recovering this endangered species.

**Individual forests** will be charged with responsibility for implementing the management for this species. Within certain boundaries, these forests should be allowed the necessary latitude and tools to accomplish recovery. Forest management techniques assigned from a regional perspective will not be able to account for the site specific nature of an individual forest and the different methods available to recover the RCW.

**Habitat Management Areas (HMA)**, and their corresponding acreage allotments and Management Intensity Levels (MIL), provide another opportunity for management flexibility that will enhance habitat while also providing forest products that our nation increasingly demands. The RCW is dependent on timber harvesting and active forest management has a crucial role in RCW recovery within an HMA.

In many instances, an HMA's acreage allotment far exceeds the area that even a viable and growing population of RCW's would use in 30 years. The Talladega/Shoal Creek Ranger District in Alabama and the Chickasawhay in Mississippi are examples of this excessive acreage designation. In areas where it will be years before RCW's will approach sections of the forest, less restrictive management in those areas is appropriate. As populations grow within an HMA, an increase in the size of the HMA can be phased in over time and accomplished at the forest plan level. As 44 percent of the total pine and pine-hardwood forests on the 11 National Forests in the South are within HMA designated

Office — 671 Forest Parkway, Forest Park, Georgia 30050, Phone (404) 361-1445, Fax (404) 361-5963  
Liaison Office — 3530 11th Street NW, Suite 410, Washington, DC 20036, Phone (202) 847-3399  
Direct All Correspondence to — P.O. Box 1788, Forest Park, Georgia 30051-1788

Response to Comments in Letter No. 143

From: Brent J. McLendon, Southeastern Lumber Manufacturers Assoc., Inc.

Comment No.

Response

1. The management direction for the RCW that is to be established by this FEIS is intended to revise the Regional Wildlife Habitat Management Handbook, amend the Southern Regional Guide and eventually become incorporated into affected Forest Plans. Regional direction for the management of the RCW is intended to be programmatic. It is meant to provide and maintain uniformity of implementation regionwide. The selected alternative does allow flexibility in many of the management practices and tools that may be appropriate for a given situation. Additionally, the FEIS recognizes that there may be site-specific situations where this direction may require modification. Modifications to this direction is allowed at the Forest and site level with concurrence of the U.S. Fish and Wildlife Service.
2. The U.S. Fish and Wildlife Service RCW Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. Both the Chickasawhay Ranger District in Mississippi and the Talladega/Shoal Creek Ranger District in Alabama are identified for recovery populations. In the absence of population-specific reproductive data, 500 active clusters will be needed to provide the required minimum of 250 reproducing RCW groups necessary to maintain long-term viability. To support a population of this size requires approximately 100,000 acres.
- The selected alternative incorporates the concept of sub-habitat management areas. This will allow additional management flexibility to those portions of the HMAs outside the sub-HMA areas.
3. Comment noted. Habitat fragmentation is believed to contribute to the continued decline of small populations in extreme risk of extirpation. Research projects, internal and external, will most likely continue in the area of RCW movements and the effects of fragmentation. Flexibility of management practices may be allowed through site-specific purpose and need. Monitoring RCW populations and habitat conditions should provide additional information on the effects of forest fragmentation.
4. Please see Letter #33, Comment #38.

areas, a phased-in approach would lessen the effects on the lumber industry and the general public while still providing RCW habitat in excess of its current and near future needs.

Sub-habitat management areas provide an opportunity for local forests to apply varied management practices which provide optimal conditions for recovery. The FEIS needs to further detail these management options and breakdown the HMA's by individual forests and Ranger Districts. As recovery of this species advances, the ability of the Forest Service to change the MIL and corresponding management practices is very important. The current situation on the Apalachicola in Florida, with a recovered population, has resulted in a non-existent timber sale program and leaves doubts as to what, if any, increase in the timber sale program will occur with successful recovery of this species.

**Research** in the past has been crucial in determining requirements for the RCW. As the data from research is at best inconclusive with regards to habitat characteristics, foraging requirements, management practices which successfully promote recovery, population dynamics, and ecosystem management, it is essential to continue this research within each forest type.

**Habitat Characteristics** - The only conclusion to be drawn from fragmentation studies is that no conclusion is possible. With very little agreement as to what constitutes fragmentation within the scientific community, and several recent studies offering different conclusions than the DEIS, it is crucial that this issue is addressed and further research conducted. Flexibility here will allow for management practices that vary the amount and type of cutting, leave corridors as opposed to management blocks, and encourage local districts to design management best suited for the RCW in their area.

**Foraging Requirements** - Here again, different studies have provided different results and question the exact needs of the RCW. The foraging criteria of 6,350 pine stems 10 inches in diameter or larger and 30 years old or older, are based on three studies conducted on one forest, the Francis Marion in South Carolina. Size of a population, interaction of that population with others, and additional factors such as habitat characteristics and site specificity of research all limit the credibility of this research region wide. As the DEIS insists on using this research for all forests, it is essential to further examine the requirements of RCW's within other forests throughout the region. It is incorrect for the agency to continue to apply the excessive 6,350 stems guideline region wide.

Flexibility within foraging requirements management may provide information to more appropriately manage for the RCW. Close monitoring by the Forest Service will allow modification at the local level when foraging requirements are found excessive for their particular area.

**Management Practices** - The FEIS's flexibility will best be shown through the ability of local land managers to experiment with alternative management schemes. As irregular shelterwood management is untested, it has the same likelihood of benefiting recovery as it does of harming. To develop research that will insure recovery of the species, a variety of management practices, including regular shelterwood, seedtree, clearcutting, and group selection should be applied. The FEIS should promote this range of alternatives and the authority of each forest to implement.

Prescribed burning and mid-story control are two essential management practices outlined within the DEIS. These practices carry a large financial and manpower obligation with little revenue return to the treasury. Without effective mid-story control, fragmentation and clearcutting would have little effect on this species chances for recovery. It is crucial that full funding for these practices is combined with

5. Please see Letter #33, Comment 60.

Comment noted. The selected alternative of the FEIS allows for both even-age and uneven-age management to occur within a HMA. Depending on the Management Intensity Level and the desired future condition of a particular HMA, a variety of regeneration harvest cutting methods are also available. The extent of a particular silvicultural system and the availability and amount of a particular harvest cutting method will be determined at the Forest and site levels based upon the needs of the RCW, the local issues and objectives, and other site characteristics.

6. The use of prescribed fire is essential to maintaining RCW habitat by controlling the woody midstory and improving the herbaceous understory. Funding for prescribed burning activities is expected from a combination of appropriated and K-V related sources. The frequency and season of prescribed fire as described in the FEIS is generally expected to control competing woody species. Where this does not occur, manual, chemical or mechanical methods may be used under certain circumstances and restrictions. Site-specific information will dictate which technique(s) will be most successful.

7. Please see Letter #37, Comment #2.

8. The selected alternative requires population monitoring be conducted at intervals determined by population size and trend.

9. Comment noted. Chapter 3 of the FEIS discusses the economic affects of each of the described alternatives on the 72 counties and parishes within the National Forests with RCW. From these 72, it further identified four counties and one parish as being most dependent on National Forest timber for additional analysis. Economic impacts will be incurred in areas dependent on timber-related jobs and income and reliant on payments to the counties. However, the degree of impact will decrease with time as stands currently in the 0-30 age class grow older. The selected alternative also provides opportunities to lessen the short-term impact through pine restoration and use of the sub-HMA strategy. This will allow the forest manager to move towards a balanced age class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat while providing income to rural communities.

Forest Service willingness to implement. Past inability of the Forest Service to carry out the 1985 guidelines, which also stressed prescribed burning, concerns SLMA as to the ability of the Service to accomplish this management.

Rotation length provides another opportunity for the Forest Service to implement adaptive management and flexible management and guidelines for each forest. Different sites and different silvicultural practices can produce heartwood, a desired quality for cavity production, in loblolly as well as longleaf pine. Allowing experiments, and directing each forest to participate, would allow the Forest Service to determine the optimal rotation age and management practices to promote recovery while at the same time limiting economic impact to the public and the lumber industry in particular. It is unacceptable that a rotation length in southern Mississippi, Alabama, and North Carolina will provide the same size trees at the same age with no evaluation of site quality or silvicultural prescription.

**Population Dynamics** - To determine whether a population is increasing or declining and how many successfully breeding pairs are within an HMA will take intensive monitoring. In addition, any surveys should be statistically correct, standardized and consistently applied. These surveys and monitoring activities will be expensive. If manpower or funding is limited, management can not be examined for potential flaws or successes, and the burden of mis-management will fall on the shoulders of the endangered species, lumber manufacturers and the general public.

#### CONCLUSION

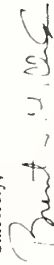
SLMA has stressed the importance of flexibility and monitoring within different aspects of the DEIS for consideration within the FEIS. Flexibility at the forest plan level should be promoted within the FEIS to assure recovery of the species while also expressing an understanding of the impacts on the private sector. Monitoring is important to evaluate the success of the recovery plan and to allow flexibility to change management as recovery is approached.

Through flexibility, the impacts this recovery plan will have on southern lumbermen and consumers that rely on them for their homes and needs can be lessened. As HMA's encompass 44 percent of the pine, pine-hardwood types on the Southern National Forests, or 2 million acres, there are extensive impacts. The localized impacts on a forest by forest basis must be included within the FEIS to inform the public of the true impacts of this plan.

The Southeastern Lumber Manufacturers Associations appreciates this opportunity to comment on the DEIS. Alternative E, with modification, has an opportunity to provide for recovery of this species while also limiting the impacts to society. Until all alternatives of management are considered, and sufficient flexibility included within the plan, the potential for appeal of this recovery plan remains high.

We look forward to working with you on management and recovery of this species.

Sincerely,



Brent J. McClendon  
Director - Forest Resources & Membership



144

March 24, 1994

Re. RCW

3/22/94

Joe Dabney  
RCW Team Leader  
U.S. Forest Service  
1720 Peachtree Road, NW, Room 718N  
Atlanta, Georgia 30367-9102

Dear Joe,

Enclosed are my personal comments regarding the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region.

1) On page ix and everywhere else in this document where it is mentioned, the Forest Service (FS) talks about ecosystem management. However in Chapter 6, Glossary, ecosystem management is not listed and defined. What is the definition of ecosystem management that the FS has given nationally and what is the definition when used in the context of this DEIS?

I am very concerned when such an important term is not defined. This means that anyone can define it anyway they want. This bothers me since in the past the FS has often either defined things different than the way I would or they have been unclear about definitions which leaves too much flexibility to managers so they can do whatever they want and call it ecosystem management.

2) On page viii and everywhere else in this document where it is mentioned, the FS talks about why the Red-cockaded Woodpecker is endangered (RCW). Yet there is little or no indication of the role the FS played in this species continued demise. As you know, on Texas National Forests the decline was discovered by FS researchers and during the time period of decline clearcutting, other even-age cutting, SPB cutting, site preparation, salvage cutting, and other forms of even-age management was practiced almost exclusively on the Texas National Forests by the FS. Since Judge Parker's ruling regarding the use of selection management (for about the past 4-5 years) the RCW populations have stabilized and in some cases have increased slightly.

The FS needs to be honest and tell about its role in the demise of the RCW and the effects that an uneven-age management system has had on the RCW.

3) On page viii and everywhere else in this document where it is mentioned, the FS has changed the language regarding RCW and their homesites. You now call homesites clusters instead of colonies. This is very confusing and the FS needs to stick to existing well understood language and not make-up new language while discussing a very complex and difficult subject.

Response to Comments in Letter No. 144

From: Brandt Mannchen

Comment No.

Response

1. Ecosystem management (EM) is a means to an end, it is not an end in itself. It incorporates a landscape level, ecological approach to management that promotes sustainability of habitat for RCW as well as many associated species and communities. This EM direction is a basic component of the RCW EIS, combining habitat consolidation of existing and future RCW populations, ecological conditions and processes that produce these RCW habitats, and restoring associated habitat for other threatened, endangered or sensitive species. The Interagency Keyword Committee concluded that ecosystem management is the integration of ecological principles and economic and social factors to manage ecosystems to safeguard ecological sustainability, biodiversity, and productivity (3/10/94). It is also considered a strategy or plan to manage ecosystems to provide for all associated organisms, as opposed to a strategy or plan for managing individual species. (from [Forest Ecosystem Management: An Ecological, Economic, and Social Assessment] Glossary or Terms). EM is also described as the use of an ecological approach to achieve the multiple use management of national forests and grasslands by blending the needs of people and environmental values in such a way that national forest and grasslands represent diverse, healthy, productive, and sustainable ecosystems. (from letter written by the Chief of the Forest Service under the file designation of 1330, outlining Agency position on Ecosystem Management, June 1992)

2. The U.S. Forest Service has, and continues to take, a leadership role in the management of the RCW. The background and specifics of the RCW in on the National Forests and Grasslands in Texas (NFGT) has been well documented in the NFGT 1992 Analysis of the Management Situation and 5-year Forest Plan Review. It is important to acknowledge that the Texas court-ordered comprehensive plan was determined "to likely jeopardize the continued existence of the RCW" in a biological opinion from the USDI Fish & Wildlife Service. Though short-term population improvements have been witnessed in Texas, much of the improvement is attributed to habitat improvement at cluster sites (artificial cavities, augmentation, and midstory control). Long-term habitat improvement must allow more flexibility for some of the court-ordered mandates; the proposed RCW EIS action attempts to insure a continuous supply of habitat through a mix of silvicultural techniques including the modified shelterwood system. The impact to timber production by use of the irregular shelterwood system is explained in DEIS, page 62. This system offers the flexibility to provide both habitat and sufficient regeneration through staged overwood reduction; the lack of regeneration was the primary concern in the court-ordered plan.



4) On page ix and everywhere else in this document where management for the RCW is discussed, here you talk about ensuring demographic stability. This is a laudable goal but the real goal of this document should be increased populations of the RCW to the extent that it can be listed as threatened and ultimately be de-listed as recovered. I find it ironic that the FS talks about demographic stability and yet throughout this document you talk about all populations of RCW except those listed in the recovery plan as critical, as supplemental populations. There are no less important or supplemental populations. The Endangered Species Act does not make a differentiation. It says that the species is to be recovered and the population will increase. The FS strategy guarantees that populations will disappear because they are supplemental and will not get as much attention as the so-called essential or critical populations. This is a good way to manage out biological diversity since the isolated populations, especially those on the periphery of the range will not fare well under this management strategy. It is the peripheral populations where evolution and genetic diversity are playing out their roles most strongly because of the need to adapt to conditions that are not optimum. This is where plasticity of gene pools is born and nurtured. I am very concerned that with the FS plan this biological mechanism to ensure ability to adapt to change will be weakened or destroyed.

5) On page ix and everywhere else in this document where MIL's is discussed or mentioned, I am very concerned about the concept of MIL's. It seems like a restatement of triage. After all it is assumed that larger populations are healthier and more safe or safe from the impacts of FS and other activities and logging activities. Yet I see no scientific information to back up this assumption.

We can easily see how vulnerable the present so-called large populations of RCW are when the effects of Hurricane Hugo are examined. Here, in the Francis Marion National Forest, perhaps the healthiest population and certainly the most studied population, has been devastated.

The ESA does not say when a bird is endangered throughout its entire range that only certain populations will get the best protection or attention. All populations are to be considered and protected. I want maximum protection for the RCW and maximum recovery effort for every population and individual.

It is not clear under the MIL concept how the risk of extinction is determined. Population is not the only thing to consider. Amount of habitat that is good quality is another factor, amount of habitat to expand into is another factor, and there are other important factors as well which all need to be considered. If as you suggest on page one you are looking at ecosystem management on a landscape scale then you know that even small, isolated populations on the fringe of the range are important to the overall health of the RCW.

In my view the Sam Houston National Forest population is not

Long-term management of RCW will require all silvicultural tools in the future, which includes both uneven-aged (UEAM) and even-aged management (EAM) techniques. Even-aged management has been used successfully on the Vernon RD of the Kisatchie, Francis Marion and Appalachian National Forests successfully maintaining large viable RCW populations. These areas have demonstrated over time that they (EAM) provide the most dense RCW population, much more dense than UEAM systems would produce. The court-ordered plan was developed as an alternative, but later eliminated due to the USDI Fish & Wildlife Services jeopardy opinion (35).

3. Terminology changes in the RCW EIS related to clusters vs. colonies and groups vs. clans is based on recommendations from scientists both outside and within the U.S. Forest Service (Walters 1988a,b). These terms have been widely accepted by the scientific community for a number of years. These terms are discussed on page xix of the EIS and Summary.

4. RCW populations identified for recovery are determined through a formal recovery plan between the U.S. Forest Service and U.S.D.I. Fish & Wildlife Service. For instance in Texas, the Sam Houston population is the only population targeted as a recovery population with an objective of at least 250 breeding pair of RCW. These population objectives are based on existing populations, habitat and potential consolidated U.S. Forest Service ownership and/or large barriers such as Sam Rayburn Reservoir. These 3 forests will have established population goals and objectives that will be monitored through time, assuring a stable or increasing status.

5. The concept of MIL's will help provide action for RCW populations with the most efficient and effective management for that area. The MIL concept is an effort to analyze the risks and manage appropriately; the basic premise being the most critically endangered populations will get the most significant and appropriate level of management. Many factors were considered in identifying populations for recovery MIL's and other recommendations; these decisions were made in consultation with other state, federal, and university scientists, including ESA regulators at USFWS.

In all RCW populations, including the Sam Houston National Forest, monitoring should reveal elements that may be negatively impacting or influencing RCW clans or the population of a given area in general. More specific monitoring elements will be described for RCW in Forest Plans such as the Revised Management Plan for NFCT. These monitoring elements should be geared to identify site specific problem areas as you suggest for the Sam Houston National Forest. Monitoring will be based on the most efficient and effective method to ascertain information; keep in mind that annual monitoring may require numerous site visits to ensure reliable data. These more specific elements will be established in a forest plan on a site-specific basis in the case of Cagle Recreation Site on the Sam Houston National Forest.

doing nearly as well as you indicate by putting it in the MIL 3 class. It is my belief that the SHNF population is very fragmented in at least half of its area (the San Jacinto Ranger District) and the other half has to contend with heavy ORV use, a campground being built in a colony site, increasing recreation forest-wide, more road density being built, increased hunting pressure, and an effort to build an environmental education center which will attract more people to disturb the birds. It seems to me when these factors are taken into account along with the extensive amount of SPB and other logging that occurs that this population has enough pressure on it that it should be labeled a MIL 4 or 5.

I want to maximize protection and have the same high intensity efforts to save the RCW for every population, no matter how small. Monitoring should be quarterly for small populations and twice per year for larger populations (200 pairs of breeding birds or more).

The FS further distorts the importance that MIL's might have on page 167 by talking about age/size class imbalances. The FS does not discuss the balance and size classes that occurred naturally and how the RCW was able to survive under those conditions. Let us face it the historical forest had many older areas than what we have today. Today the forest is generally younger and does not reach old age. The FS does not allow this.

I am concerned about subRMA's and what MIL's will be required if the population expands beyond the subRMA. Apparently the FS will allow more timber cutting if such expansions occur and will not protect these populations as much. At least that is the understanding I get from this description.

In addition on page 201, for MIL 1 & 2, recruitment stands are deemed as not needed. This means that if a catastrophe occurs in a MIL 1 or 2 and the FS has cut so no recruitment stands are near by of sufficient quality or quantity to sustain the population that the bird is out of luck. You need to protect all the large old pines that you can since there is a shortage of these right now and this is what the bird wants to use as a nesting and roosting habitat.

On page 147 the FS only allows optional replacement stands in MIL 1 and 2. This again leaves the FS room to cut more and leave the bird less cushion in case of catastrophe or in case the management does not work out as well as the FS says it will.

Further the MIL's will have direct, indirect, and cumulative effects since whatever an area is designated will limit or increase the amount of management or resources that are given to an area. Such designation on page 201 allows activities like clearcuts or other even-age variants, allows an unproven cutting method like irregular shelterwood, allows shorter rotation ages (like the SPB 80 yr. rotation), all of which will reduce RCW viability and likelihood of survival.

Management within each MIL for a particular forest becomes very site-specific as considerations for adjacent stands, age, size class, other ownerships, as well as many other factors must be considered. We agree with the concept that forests today are generally younger, but direction in this document and in Forest Plans are promoting management for older forest conditions. As RCW populations expand, Forest Plan revisions can be expected to incorporate these changes, including changes to RMA boundaries.

Recruitment and replacement stands are a necessity in populations that are well below their population objective. In populations at or above recovery level, these stands are not essential because sufficient active and inactive clusters exist within the RMA providing adequate habitat. Recovered populations were established at levels that could withstand catastrophe.

Monitoring will be an essential element of this effort and will allow for improvements and adjustments in the management of these populations.

6. Rotations established in the RCW GIS are based on the best scientific information and with the involvement of scientists both within and outside U.S. Forest Service. In RMA's numerous clusters, recruitment and replacement stands will be managed to ensure a wide dispersal of old-age trees for cavity development. The rotation ages established are to ensure a long-term supply of foraging habitat between these older forest stands. It would be potentially catastrophic to manage an entire RMA on extremely long rotations, building a worst-case scenario for large scale loss of habitat due to insects, disease, or weather.

Rotation lengths will be established for individual forests based on this document and associated Forest Plans. The GIS for the National Forests and Grasslands in Texas will disclose the rationale for rotation ages; again, foraging habitat for RCW is initiated at 30 years, allowing for a minimum of 50 years RCW habitat. Cluster sites, recruitment and replacement stands will provide numerous sites where trees exceed the 80-year rotation.

7. Artificial cavities have been used to ensure population expansion in areas where insufficient cavity trees or potential cavity trees exist. This may be due to over-cutting due to short rotations, catastrophic conditions, or over-cutting prior to U.S. Forest Service ownership. In Texas, where Southern Pine Beetle epidemics are common, efforts to assure restoration of longleaf pine (more resistant to SPB) and 80-year rotations appear to be the most prudent decisions to assure long-term habitat within the RMA's. In these situations artificial cavity development may be necessary for many years to come. The National Forests and Grasslands in Texas has had many successful efforts with artificial cavities and translocations. These efforts have been documented in the annual RCW meeting summaries for that Forest and in publications available through USFS Research Laboratory in Nacogdoches. Translocation and artificial cavities are not the answer, but an interim effort to ensure population stability.



6) On page ix and everywhere else in this document where rotation age is discussed or mentioned, the FS does not allow for old enough rotations. For instance this document states that red heart disease is not real common in Loblolly Pines until 75 yrs. and Longleaf Pines until 100 yrs., but you have an alternative option under E which allows 80 year rotations for Loblolly Pines for SPB areas. This could apply almost to the entire Texas National Forests and I would think the FS would take such a broad interpretation so it can cut as much as possible.

This means that only 5 years after red heart disease is common in Loblolly Pine the FS will cut down these trees. Since your own research shows that it can take up to 9 years to develop a cavity and since it takes longer to develop a cavity with a tree with less red heart disease this means RCW will be hard pressed to find enough trees to build cavities.

Further research shows that RCW will take the oldest pines they can, probably because there is more red heart disease in the oldest pines and it is easier to excavate the cavity. In fact RCW are limited now to choosing the optimum tree for cavity excavation because there are no or very few trees for them in the over 150 year age category (really over 100 years). Therefore we do not really know what the preferred age for a cavity tree is since we have logged all of the really old growth pine or those that remain are in situations where there are not enough pines around them to support a RCW colony site.

I want rotations mandated that are 150-200 years for Loblolly Pine and 200-300 years for Shortleaf and Longleaf Pines.

On page xvii it is mentioned that Alternative C has the potential for extremely long rotations but this term is not defined. How long are these extremely long rotations?

On page xxxvii it is very important that rotation lengths and regeneration methods are not made at the local level. There is less environmental analyses at the local level. Since 1987 in the National Forests in Texas there has not been one EIS done for any FS or other activity allowed on these forests. By allowing all of these decisions to be made at the local level you avoid looking at specific environmental impacts that are regionwide but implemented locally. I object.

On page 12, the FS again dodges the issue of its culpability in the RCW decline by talking about forest practices before the FS acquired the land. The FS has cut a lot of 80, 90, and 100 yr. old pines in Texas National Forests and has a rotation age of 70 yrs. for Loblolly and 80 yrs. for Shortleaf and Longleaf Pines. So your present rotation ages insure that RCW do not have sufficiently old cavity trees that they prefer.

Under alternative B, page 98, the 80 yr. and 100 yr. rotation stands for recruitment is not enough to ensure adequate old age

These efforts are closely monitored and guidelines continue to be developed that promote genetic compatibility, limited disturbance, and high probability of success. The ultimate goal of the RCW EIS is to have RCW populations and sub-populations reach levels where artificial cavities and translocations are unnecessary.

8. The RCW EIS is developed to provide guidance in identified pine or pine-hardwood sites. Forest Plans will evaluate and describe more specifically land type associations (LTA's) within the USFS Ecological Classification System that provide these pine dominated habitats. This ecological information will be used in a more site specific basis to establish HMA's in the Forest Plans. LTA's and stands that have a hardwood dominated ecological component will not be included within the pine and pine-hardwood prescriptions for the HMA's. Likewise, management areas such as Big Creek Scenic Area in Texas have not been included or calculated into the pine and pine-hardwood habitats required for RCW management. These specific sites, though completely surrounded by upland pine dominated HMA landscapes, will be managed for the specific character and emphasis described in the Revised Forest Plan for the National Forests and Grasslands in Texas.

The mix of hardwoods in pine stands (28) is based on optimum conditions for RCW and species that prefer similar habitat. It is not designed to provide optimum or maximum mast for species that require this habitat. If the site is ecologically defined as a hardwood dominated site through the ECS, then it will be managed as such and not as part of the RCW HMA pine dominated uplands. Ecological conditions specifically for Texas have been described in detail within Appendix A of the Draft Forest Plan and Appendix H of the Draft EIS for the plan. The more specific situations in Texas and potential ecological conditions are described in more detail within that document; it is not within the scope of this EIS to describe these specific ecological conditions throughout the Southeast.

9. The 25-year foraging habitat proposal has been changed on page x and throughout the final document to describe 30-year minimums.

10. This programmatic RCW EIS lists the Angelina and Sabine populations as one, due to their close proximity. The Draft Forest Plan Revision has further clarified this situation and identified specific objectives for each forest.

11. Big Creek Scenic Area, Texas wilderness areas, and other special area designations have been removed from the calculated RCW HMA pine and pine-hardwood requirements in the Draft Forest Plan Revision. In some situations (Boykin Springs and Beech Ravines) HMA requirements will still apply, but these are fully described in the Management Area, DPC Objectives and Prescription Standards. It is beyond the scope of this document to map and describe inclusionary stands and management areas that, though surrounded by RCW HMA, will ultimately be managed outside of these guidelines according to both Forest Plan direction and Environmental Assessments on a site specific basis.

red heart disease pines. I am against not having recruitment and replacement stands here. Both are needed and they need to be old aged (150-200 yrs. Lobloily and 200-300 yrs. for Shortleaf and Longleaf Pines).

On page 166, Table 2E4, I am totally opposed to 80 yr. rotations for any Lobloily Pines. This is approximately when red heart really becomes common in Lobloily. Also on page 208 under Figure 1, there should be more potential cavity trees in the trees older than 80 years old because they will be easier to excavate and therefore more trees will be available compared to the total of trees in the less than 80 year category (RCW do not like or prefer such young trees).

On page 327 in your glossary you say nesting habitat is 70 yrs. for Lobloily and 90-95 for Longleaf Pine. This is not true since the RCW looks for the oldest pine they can find and prefers these. Red heart does not become common, according to this DEIS until 80 yrs. for Lobloily and 100 yrs. for Longleaf so your nesting habitat definition is too young and wrong for optimum use for this bird.

On page 432 the target ages you show are much too young and carry too great a range in age. They need to be 150-200 years for Lobloily and 200-300 for Shortleaf and Longleaf.

7) On page ix and everywhere else in this document where use of artificial cavities and translocation is mentioned, I am very concerned about the impact this massive program will have on the RCW.

Is it possible that such programs, when so massively applied, across the entire range of the RCW will change the behavior of the bird so that it is less able to care for itself since it does not create cavities often and does not find its own mates?

This document assumes that translocations will go smoothly. Yet there is no discussion or summary to date of how the 85 translocations that have occurred in the past 3-5 years have done? How many were successful? Why were they successful? How many were unsuccessful? Why were they unsuccessful? How do you measure success and why? Is it too early to tell how pairs will do even if they have fledged young? Should not one wait until several generations have survived and successfully fledged before saying that such actions are a success?

When translocations are mentioned on page 69 and other places in this document there is no discussion about genetic compatibility, habitat suitability preferences, differences in climate and other factors that may make translocation not the best alternative. For instance, if all colonies are full in one area is it best to translocate a bird to an area where it was not born or did not come from? Do RCW eat the same foods everywhere in their range?

12. The RCW EIS establishes a framework by which RCW groups and clusters could be managed as essential. This document does not make the decision which specific wilderness area would provide that habitat and the standards prescribed. That decision will fall within Forest Plan revisions.
13. Monitoring of groups and clusters will be accomplished within the framework established in this document. Forest Plans will detail monitoring efforts more specifically for each administrative unit (Forest). The guidance for monitoring intensity is based on risk analysis and effectiveness.
14. The term "historical use" by RCW has been established as known population locations in the year 1986. Prior to this time, many group locations were unknown. RMA's, as proposed in the RCW EIS may be amended through Forest Plan revisions that fully document the rationale for the change. The NPCT, for example, has identified substantially more upland pine habitat than what is prescribed in this EIS. Much of that habitat will be restored to longleaf pine to provide better habitat throughout the historic identified range for RCW.  
Even-aged management has and should continue to be used successfully for maintenance of RCW clusters. Even-aged management has been used successfully on the Vernon Ranger District of the Kisatchie, Francis Marion and Appalachian National Forests, successfully maintaining large viable RCW populations. The majority of longleaf pine on NPCT are 50-70 year EA stands. Once longleaf pine stands approach 80-100 years, management towards UEA conditions could begin; very few areas exist with longleaf pine of this character. Management for RCW will be a continuing and evolving effort based on sound monitoring and evaluation.  
Old Growth conditions do not equate to RCW habitat. An obligate species requires all habitat needs within Old Growth Conditions. This is not the case for RCW since these birds forage in 30-50 year old pine stands. This document does not make the decision to establish Old Growth areas on individual National Forests; this is a decision that will be made in individual Forest Plans.
15. Amendments to the vegetation management EIS regarding specific herbicides and their use have been made on a continuing basis as new information becomes available. [The current use of herbicides and the recommended application rates can be found in the Draft Forest Plan for NPCT.] The degree of use for all chemicals and herbicides will be fully documented in each Forest Plan EIS, and later in project level environmental analysis. The EIS for vegetation management in the Coastal Plan/piedmont fully evaluates considerations for air pollution and drift.



On page 178, there are no boundaries for how large or extensive this translocation program will be. What are the geographic limits that will be imposed for translocating birds? How many birds will be translocated? Certainly an estimate is likely right now since we know approximately where the birds are on the national forests and what numbers are in the colonies. How will geographical variations be determined or differences due to range?

On page 203, how far will the bird be taken from its locale? How will local genetic adaptability ~~with~~ be preserved? If birds are taken from more densely populated areas and from larger more stable populations how will small, isolated geographically scattered populations be helped?

On page 204 there is discussion about direct impacts of using artificial cavities on the birds. One direct effect not discussed is the weakening of the tree so it is more susceptible to breaking off prematurely. Again, this has been done for such a short period of time it is impossible to say what the real effects will be. Such a large scale program, including both artificial cavities and translocation has never been tried before for an endangered species. We are talking about an experiment. Where will your controls be in case something goes wrong and you want to compare natural populations and those with massive artificial cavity and translocation use? Will we end up habituating the bird to humans so they lose their fear? Will they be able to consistently, on their own, make their own cavities? Will they lose the desire to do this and wait for us to do this for this?

On page 362, I am concerned that by trapping populations the FS may find it easier to move the birds around then to manage for them and let the birds expand where they want, naturally. This is an incentive for the FS to consolidate populations. Such actions may have detrimental effects on natural dispersals and may artificially keep the birds from expanding where they want to go. In essence my concern is not that some artificial cavity use and translocation occurs, but that a massive program as envisioned here substitutes our intelligence for the birds. We do not know what is good for the birds better than the birds know. Why are we trying to play God?

8) On page x and everywhere else in this document where it is discussed or mentioned, the proposed midstory removal plan has me worried. It is too intensive and too complete and too extensive. It sounds like you are going to cut almost all the midstory and overstory hardwoods and manage a commercial pine plantation, not a pine-hardwood ecosystem. This means there will be a monoculture and not a diverse forest.

I am concerned that such an extensive program will result in reduced homes for the squirrels and woodpeckers that compete with the RCW for cavities and could make cavity competition even

16. It is recognized on Page 49 of the DEIS that fire regimes varied throughout the South. Specific burning programs for each Forest will be described in each Forest Plan and accompanying EIS. Site specific conditions likewise will dictate greater specificity for each prescribed burning plan. It is recognized in the EIS that individuals of whatever species may be affected by fire; however, the direct, indirect, and cumulative effects of an aggressive prescribed fire program as described will benefit population species diversity of virtually all known PFT Species associated within Southern upland pine and pine-hardwood ecosystems. The majority of the native plants, animal and PFTS species which occupy similar habitat to that of the RCW depend on the same fire dependent ecosystem as the RCW. Therefore, the use of fire as a management tool to reduce midstory should have little or no impact on these species. Growing season burns (spring-summer) will be used in most cases, however, burning will occur throughout the year when the weather is suitable.

17. The SPB EIS is a working document that is regularly reviewed and evaluated. If amendments to this document are appropriate, that process will be initiated. It also is a regional environmental analysis that does not review individual effects on specific forests, wilderness, or special areas. It is beyond the scope of this RCW EIS, the Vegetation Management EIS, or the SPB EIS to make these site specific evaluations. The opportunity to allow 80-year rotations for shortleaf or loblolly pine in high risk SPB will be identified in specific Forest Plans with substantiating reasons for this reduced rotation. See response to Comment 6 regarding rotation age.

18a. The RCW EIS establishes broad HMA's for RCW on 11 Forests. It is beyond the scope of this document to detail site specific actions. Individual Forest Plans will describe specific management area allocations, developed recreation and facilities sites and special areas that may be excluded from the pine and pine-hardwood habitat calculated for RCW habitat. Project level analysis implementing Forest Plan direction will likewise specify potential effects, monitoring requirements, and mitigation measures on a site specific basis for construction and management of recreational activities.

18b. The 2 million acres provided for RCW HMA provide sufficient habitat to achieve recovery levels as prescribed for USFS by USDI Fish & Wildlife Service in 1985. This document only deals with RCW found on U.S. Forest Service lands; it is beyond the scope of this document to include other government or privately-owned lands.

Multiple-Use considerations are the cornerstone of this Ecosystem Management and multiple resource sustainability to include the RCW. The effects of the proposed action on these multiple resources are described in detail throughout the EIS. More specific analysis will be found within Individual Forest Plan revisions and subsequent project level environmental analysis to include harvest techniques by site fragmentation, management intensity levels, and habitat required to support clusters and ultimately historic populations.



worse. There is no discussion of this potential in this document. In addition there is no discussion about the role that hardwoods play in reducing SPB susceptibility of stands because they screen pines and make it harder for SPB to expand rapidly and make it harder for SPB to find new host trees. The FS's own document, "The Southern Pine Beetle", states, on page 168 that, "Spread of infestations is greatest in dense pine stands. Hardwoods limit these conditions by disrupting continuity between host trees. Intermediate cuttings should favor hardwoods that are suited to the site and are compatible with long-term management objectives." It seems obvious to me that having a good hardwood component is a plus for the RCW to reduce SPB risk.

It is not that I do not believe that some midstory removal, especially near cavity trees and colony sites is not necessary. It is that the wholesale removal that the FS proposes makes the stands more susceptible to SPB attack and reduces biological diversity. Certainly the virgin woods that occurred throughout Texas and the South did not have so little hardwood as you propose. The FS proposal means that literally millions of acres will have almost no hardwoods. This cannot be defended biologically or for the protection of the RCW.

This proposal to remove hardwood midstory and upperstory never talks about how much hardwood retention is appropriate. It never gives firm figures about how much territory in each national forest or ranger district will have such cutting allowed. It never talks about the horrible consequences to Big Creek Scenic Area if such a plan is implemented. This plan does not discuss scenic areas at all. It does not tell how PETS like Trillium, a sensitive species, will be affected by this proposal. Trillium is found in Big Creek Scenic Area in an inactive colony site and within the HMA for Sam Houston National Forest.

On page 28, there is no scientific documentation that backs up the assertion that the retention of up to (this means zero to 3) of 3 desirable midstory trees/acre (desirable is not defined) and or up to 10 (that is zero to 10) overstory dominant and codominant hardwood trees/acre will provide sufficient mast for species that like mast. What is the impact on squirrels compared to what we have today? What about deer? What about all other mast using or loving species? You have absolutely no data to tell us.

Natural hardwood areas also include pine-hardwoods. If dominants are not a problem then why will you cut them at all? Why do you want to leave so little hardwood left?

On page 49, all of this proposal concerns me more because currently, in Texas, I see the FS removing almost every hardwood during midstory removal. This leaves a desert for many species and reduces biological diversity.

Information regarding populations and sub-population delineations have developed through published research and scientist collaboration as described in Appendix A. Many of the specific distances and population criteria were developed through consensus during the 1990 Summit on RCW (Appendix D). The management for long-term sustainability of RCW populations and sub-populations will be a continual evolution as more information becomes available. This EIS incorporates the best RCW management information available and was developed with full collaboration of not only USFS personnel, but USFWS (see non-jeopardy opinion) and other scientists as well. No populations identified in the 1985 RCW recovery plan are being allowed to go extinct; on the contrary, all 12 populations have population objectives meeting or exceeding those identified in the recovery plan. Additional sub-populations, upon reaching objective levels, could exceed the minimum criteria of 250 breeding pair of RCW as identified in the 1985 recovery plan. The 400 breeding pair level may be difficult to achieve due to limitations on available pine and pine-hardwood habitat on USFS lands; as populations reach the 250 pair level, monitoring and evaluation will continue and changes made if appropriate.

19. Comment noted.

Table 1-2 is a summary of criteria used to assess population status depending on management intensity level. Specific and detailed discussions of these actions are found further within the document.

Selection management as you describe infers a bias towards stand high-grading. Selection systems are based on a systematic maintenance of all size classes within the stand; with an upper limit identified to assure cavity tree development while also allowing regeneration.

Comment noted.

Management for long-term sustainability of RCW must maintain a mix of successional stages. This can be achieved across the range of southern national forests only if all techniques are available to perpetuate these successional stages. The proposed action allows the use of both even and uneven aged systems.

Comment noted.

Snag retention is proposed based on information cited in Chapter II and through on-going research by Dr. Richard Conner.

Irregular shelterwood will not meet the "commercial" productive capacity of a site, but is believed to be the best opportunity to supply retention of older trees, regeneration and SPB hazard reduction. The 120-year "implied" rotation within the 3/4 mile zone is summarized as such on Table 2-A2 since all cutting would be prohibited unless needed to enhance RCW habitat. Patch cut size is found in Table 2-A2.

On page 148 it is not clear why you make Alternative D more harsh in terms of midstory removal than Alternative C. This seems particularly peculiar since Alternative D is supposed to be the more natural management option. On page 202 midstory removal does not make more foraging substrate available. The substrate is already available. It may be easier to find but I even question this. It seems a bit ridiculous to say that a bird that has spent thousands of years evolving with pine-hardwood forests, both densely populated pine forests and those with larger hardwood component, could be so blind and stupid that it would not be able to find pines to feed off of. This makes no biological sense.

On page 206 it is not clear how much pine midstory reduces suitability for nesting habitat. How did this bird survive when we were not here to help it. You make the bird sound helpless. But the bird was able to survive the ultimate hit of early thinning logging and do well but has not been able to survive our present day even-age logging program. Pine midstory can be burned and uneven-age management can work. This is how forest naturally worked. With mostly small disturbances that opened up the forest and allowed pines to regenerate. Small pines were not all burned during fires since fires skip around and create mosaics and not totally burned areas. I have seen this happen on Sam Houston National Forest. So why do you say that uneven-age management will not work with fire.

On page 216, I also do not understand why herbicides are needed for uneven-age management. By cutting periodically you can open up the forest as well as all the disturbances that occur naturally (lightning strikes and fires, tornados, ice storms, hail storms, wind storms, hurricanes, southern pine beetle areas, etc.).

On page 221, I disagree that midstory removal will not affect mast production much. You provide no documentation to show this or to show where mast dependent species can move when this midstory removal occurs. Since you have to assume that the forest not cut is at its carrying capacity then it cannot take refuge animals from cut areas. Also if the cut areas are large then the animals have to travel a long way to get to uncut areas (midstory removal). You talk about limited capabilities of midstory for mast due to shading but you ignore dogwood, hornbeams, holly, and other trees which provide good mast in the shade.

It does not seem necessary to take out all midstory in replacement and recruitment stands. Even in colonies there should be 20% left, away from cavity trees.

On page 263, this document asserts that midstory removal will have minimal effects on biodiversity but you provide no studies to back this up. It seems to me fungi will suffer as well as other species that rely on hardwoods for some or all

Comments noted.

Alternatives are not defined solely by a silvicultural technique. All techniques and general methodology are described in common activities--regeneration (Chapter 2). Figures 2-C2 and 2-C3 are merely clarifying differences as described between longleaf and loblolly pine examples.

In Alternative D, sustaining habitat through time infers reaching or exceeding the population goal as soon as possible and maintaining that level. Each population is expected to increase based on existing and future habitat; however, Alternative D does not establish regeneration. This could inhibit a sustained population level through time, affected by natural forces and other unpredictable situations.

Credible information is substantiated through the use of cited scientific literature that has undergone extensive peer review, as well as published agency reports that are available to the public upon request.

Comments noted.

Discussion of direct, indirect, and cumulative effects in clusters, recruitment and replacement stands is described previously in Chapter 3.

Clusters are considered in the discussion for foraging habitat as stated. They are not considered in later discussions unless specifically identified.

See previous response regarding irregular shelterwood.

Comments noted.

Direct, indirect, and cumulative impacts for a broad range of PETS is described in general terms. Site specific analysis for individual projects must take into account risk involved as described in the disclosure of effects segment.

Comments noted.

See Literature Cited for complete details of studies summarized. It is beyond the scope of this document to duplicate all known literature regarding vegetation management in Southern Forests.

Comments noted.

20. Biodiversity and PETS will be affected by the proposed action; changes have been made to clarify these effects. More specific analysis of these effects will be described in subsequent Forest Plans and project level environmental analysis. These plans will provide details of monitoring actions to evaluate population status of these many species.

of their needs for shelter, food, breeding places, nesting or egg laying places. You only address mast losses and none of these other real losses. For instance the loss of downed logs and leaves which provide forest floor cover and reduce evaporation and keep an area moist for salamanders is critical for their survival. But you ignore this as a possible impact.

On page 264, it is unlikely that when species are eliminated and are replaced by species new to the stand via hardwood removal that you will not lose diversity. After all you are losing tree species and forest structure by removing hardwoods. How can you have anything but noticeable changes in the landscape especially since millions of acres and thousands of acres in the same place will have hardwoods removed, both midstory and overstory. This will affect the way the forest looks, how transpiration and thus moisture content occurs (hardwoods generally generate more water than pines) thus the area will be drier and hotter and creatures that need moisture will have a harder time surviving (microbes, protozoans, annelids, insects in the forest floor, fungi, etc.

On page 269 the amount of overstory hardwood that will be left is not definitely stated. This means that guidance is too loose and will allow too much discretion which means more hardwoods will be cut. You keep mentioning runner oak and dwarf live oak but we do not have these species in Texas. How will Texas National Forests be affected? You need to look at geographic and biological regions and their differences and what this means about impacts.

But you do not do this. You treat all areas the same although scientists acknowledge that there are very definite differences between the Longleaf Pine Forests of the Western and Eastern Gulf Coasts. For instance there is no Slash Pine or Wiregrass in the Western Gulf Coast, naturally. In addition there is more Shortleaf in the north and more Loblolly in the south of the region. You are not using an ecosystem approach where differences would be highlighted and looked at.

You treat all pine or pine-hardwood forests the same as far as management and only barely differentiate in rotation age. Therefore the loss of mast cannot help but be different due to the difference inherent by different pine and pine-hardwood ecosystems in different geographic locations.

9) On page x and everywhere else in this document where a 25 year old foraging habitat is mentioned or discussed, there is absolutely no documentation to support this over the established 30 year foraging habitat standard.

For instance, on page 50 it talks about using the 25 yr. foraging habitat with no explanation why the present standards and guidelines for RCW management use a 30 year definition for foraging habitat. I have not been able to find in any of the literature why such a low age pine tree has been chosen. I fully support the 6350 stems that are required as insurance for the RCW

21. Clarifications have been made in Chapter 3, Regional and Local Economics. Background data used was 1987-\_\_ in order to evaluate .....

Payments to counties?

Price per MMBF?

22.



so that adequate foraging habitat exists.

It seems obvious to me that the FS wants to reduce the foraging habitat age in one alternative only, Alternative E, (none of the other alternatives has less than 30 yr. old foraging habitat) so that it can cut more older trees but still claim to have adequate foraging habitat. The Fish and Wildlife Service blue book and the RCW Recovery Plan do not allow for such young foraging habitat. On the one hand you go by the book in the RCW Recovery Plan and say you will only protect maximally the populations mentioned in the recovery plan as being necessary for the birds survival; on the other hand you completely deviate from the recovery plan, blue book, and S & G's and say 25 yr. foraging habitat is acceptable with no explanation and no scientific data to back you up. This is hypocritical. On page 323 you even say the linkages should be at least 30 yrs. old but not the foraging habitat around the colony site.

10) On page xi and everywhere else in this document where the Angelina and Sabine RCW populations are mentioned or discussed, each of these populations needs separate population objections. The populations are separated enough and existed historically as different populations. They have been so since Toledo Bend and Sam Rayburn lakes were built.

I have some concern about the way you display colony sites because you show active and inactive colony sites but you do not show the actual RCW population. How many total birds are there in the colonies that are inhabited? This is important information that ought to be shown. If you do not know exact numbers then you should be able to show good estimates since colonies have been censused periodically in recent years.

I am very concerned that the FS is not considering the populations in Sabine and Angelina NF's as crucial. Just because they are not in the recovery plan does not mean they are not important. They need just as much attention, in fact more, than the populations in the recovery plan because they are much more endangered.

While Angelina and Sabine NF populations should be considered two populations here is the ideal example of the need for a corridor to eventually connect these two isolated populations naturally and provide genetic exchange. This needs to be written into this management strategy.

11) On page xiii and everywhere else in this document where issues are mentioned or discussed, you left out a very important issue that I called to your attention several years ago. Namely, what happens to scenic areas in this scenario.

For instance, Big Creek Scenic Area, in the San Jacinto Ranger District of Sam Houston National Forest is part of RCW colony sites.

Because of this the FS has been hacking away in the BCSA on the pretext of SPB control to supposedly save PCW habitat. However, the SPB keeps coming back year after year and the FS cuts and leaves and mostly cuts and removes. You are logging a scenic area to protect the PCW yet not one word do you give to the destruction of this scenic area by such activities. These are part of the environmental impacts and because of their long-term effects they are essentially irrefutable and irreversible. After the cutting has occurred you cannot take it back. The forest is destroyed for 70-80 years until the trees can grow back. Hardwoods are destroyed during this logging or severely wounded. Huge ruts due to poor logging occur along with sedimentation and erosion as well as compaction. But the FS keeps ignoring the impact that this has on water quality, recreation, biodiversity, aesthetics and scenic value, wildlife, and other values that Big Creek Scenic Area was set aside for.

In addition some of the logging has occurred where a PET is, the Slender Wake Robin. In fact I have found areas where the remains of Slender Wake Robins are. But you say absolutely nothing about how this PET, that is found in Pine-Hardwood Forests is impacted and destroyed by activities that theoretically are supposed to protect the PCW.

In fact you do not even have Trillium gracilis on your Appendix C PETS list which makes me wonder how accurate and all inclusive this list is. You cannot claim ignorance since my appeal of 1-13-92 of the RCW S & G's includes on a list of PETS plants this species and my letter of November 8, 1991 to you mentions the cutting of trees in BCSA. Copies of these documents are enclosed along with a map depicting the RCW zone in BCSA along with some of the cuts that have occurred due to SPB control. Please give a complete description of the impact on Trillium and other forest interior and slope forest species that this document will have if all the proposals are implemented.

My other concern is that BCSA is included in the HVA in Appendix E. Please tell me if this means that BCSA will be managed for PCW and therefore will be cut to perpetuate pine trees and will midstory removal be allowed and other activities? Just what is the disposition of BCSA with respect to what you propose in this document? What will happen to the hardwoods in BCSA if such management is imposed? Give a detailed description of the destruction that could occur.

On page 27 you talk as if the majority of the PETS will do better with this plan. But the Trillium, for instance, will not. How many others will not. You ignore the differences between a pine-hardwood forest and a pine forest. When you destroy the canopy species like the Trillium will be destroyed. But you do not say this. You need to talk about how each PETS will be affected and not make broad generalizations. This is not adequate in an EIS. In addition on page 28, the project level evaluation never gives good consideration to PETS. SPB cutting



has no project level evaluation with public input. You are simply referred to the SPB EIS and EA which do not address the problem of PETS destruction and the fragmentation of habitat and species isolation that occurs due to cutting in scenic areas. In essence the FS is always pointing to some other FS entity or process and says, "that will take care of such questions". But this never occurs. How come?

On page 224 you ignore that the use of fire will hurt some species like the Trillium in BCSA. Does this mean the FS will use fire in the BCSA? Which others species will be hurt by fire due to control efforts? How about the Nodding Nixie?

On page 261, I disagree that there will be minimal effects in the 3/4 mile circles for RCW. Those species like Trillium which are forest interior species will be destroyed. The loss of hardwoods and shade for Trillium ensure that it will not do well under such management as well as the burning envisioned. These effects have already occurred with Trillium so why do you ignore them?

On page 413, I disagree about whether isolated patches are created. The FS already does this in BCSA since the area is becoming surrounded by clearcuts and pine plantations. In addition your assertion that such activities, "Does not necessarily fragment the forest", certainly is not true for BCSA and Trillium. Due to this plan's approved SPB cutting in this scenic area a PETS is being destroyed. Yet the SPB EIS does not cover this problem and does not address BCSA. How can you then call that document adequate? It is not and this issue must be addressed in this document.

12) On page xxvi and everywhere else in this document where wilderness management and RCW is mentioned or discussed, it talks about control in wilderness with appropriate guidelines. What does this mean? You should explain what this control consists of.

On page 43 I am very much opposed to any midstory removal in wilderness areas. This will destroy wilderness values and the area will no longer be a wilderness.

Also on page 119 you say wilderness will be excluded from HMA unless specific wilderness plan can accommodate RCW management. But then you say that replacement stands will be selected for essential wilderness groups. I am against using wilderness to actively manage for RCW. I do not support your program of prescribed burning, midstory control, replacement and recruitment habitat in wilderness areas. I want the FS to work to draw out RCW from wilderness so that the conflicts will be reduced or eliminated. I also am adamantly opposed to any SPB control in wilderness areas. By doing this you destroy wilderness values and make the area susceptible later for additional SPB attacks

by encouraging dense growth of pines.

On page 289, Little Lake Creek Wilderness Area has had drastic changes to its wilderness character due to SPB control. It is natural to have SPB attacks (see page 291). On page 289, wilderness protection has not resulted in dense pine midstory. This was there to begin with as a legacy of FS management. The FS has always been able to introduce fire as part of the natural process in wilderness areas. But the FS has chosen not to until now when it seems to want to manage for pine in and near wilderness areas.

On page 356, tell what a wilderness management plan for the RCW would look like. Where is this done now? How will the conflicts between the Wilderness Act and Endangered Species Act be resolved?

On page 414, we do not know how to manage wilderness. What the FS is advocating is an arrogance that says we know more than Nature. Nature should be allowed to manage itself. In addition you do not define ecosystem restoration just like you do not define ecosystem management. Let wilderness take care of itself. Humans want to tinker too much. The reason national forests in the South have come back is because Nature was allowed for a long time to grow them back.

13

13) On page 2 and elsewhere in this document where the issue of colony monitoring is mentioned or discussed, the present proposal does not have enough monitoring of populations. In small populations the monitoring should be quarterly and in large populations it should be every six months. A small population would be less than 100 pairs and a large population would be larger than 200 pairs. This increased level of monitoring is needed in case a population has trouble. If it does you want to understand why it has declined or disappeared. By waiting a year before you get to that population you ensure that the reason it disappeared or declined will never be known. Catching declines early can help ensure that maximum efforts are expended immediately to protect and bring back that population.

On page 109 and elsewhere in this document there should always be "population specific reproductive data". That is one of the reasons you require monitoring in the first place. If there is no site specific population reproductive data then the acquisition of this must be done immediately. It is ridiculous to assert on page 104 that only 10% of the colonies will be visited annually to determine the status. This needs to be upped to 100%. There is no excuse for not monitoring an endangered species population every year.

On pages 190-193 it is very interesting that for Alternative E you give very detailed monitoring requirements but for all the other alternatives you do not. This is biasing in favor of this

Alternative E. All alternatives must have the same stringent, minimum monitoring as a prerequisite for protecting the RCW. Otherwise the alternative is not acceptable.

Further the present monitoring system contains no trigger levels which will require investigation of what is occurring to the RCW if their populations start to decline. What trigger levels will you use to look at RCW populations and the condition of their habitat to decide when unacceptable impacts occur and mitigation and protection must occur (page 196)?

I am against no monitoring of greater than 250 active colony populations (page 89). This means if a large population starts to have problems then you will not know it until the problem is far advanced. At least twice/yr. monitoring is needed.

Also on page 89, any initial colony surveys for each compartment need to be done within 3 yrs. of the approval of this plan. Otherwise the process will be too slow and colonies may go extinct before they are surveyed.

14) On page xvii and everywhere else in this document where it is mentioned or discussed, the historical use of the forest by the RCW is mentioned. It states that, "where they occurred historically and would provide better habitat for the RCW". But this phrase is not defined and its meaning outlined. It seems to indicate that historical use of habitat is not the only criteria the FS is using to determine where it wants RCW to be. It also appears that the FS will make the decision where it, "would provide better habitat for the RCW". But there is no discussion what criteria will be used, who ultimately will decide, and how this will be defined and implemented. Such a discussion must occur in this document.

Related to this issue of historical use, on page xviii and elsewhere in this document, the FS only commits to "encourage" Longleaf Pine growth where it historically occurs and where it benefits RCW. This phrase is also not defined but even more disturbing is that there is no solid commitment here. Only a act to "encourage". If, as the FS and other biologists say is true that the best habitat for RCW is LLP why is not the FS committed to growing this species in the areas where it used to grow on federal lands? Why is there no estimate of how many acres this includes and how many acres the FS is committed to reconvert back to LLP? Why is there no map showing where this LLP historical habitat is and what areas will be restored by the FS?

In a further obfuscation, on page xxi, the FS claims that even age management has not adversely affected the RCW over the past 30 years. Yet there is zero scientific documentation to prove this assertion. In fact there is a lot of documentation to disprove it. In Texas National Forests, when the Judge ruled in

1988 that even age logging had been responsible and the FS had been responsible for the decline of PCW in Texas National Forests, the Fifth Circuit did not overrule this opinion but said the Judge could not substitute what specific kind of management the FS could use, the Judge must decide on whether what the FS proposed would pass muster and protect the bird from extinction. Is it not funny that in the past 4-5 years with the implementation of the Judge's order to allow selection management for the RCW that populations appear to have stabilized?

On page 2, even age management does not mimic LLP area regeneration. If you read Chapman's reports from the early 1900's in Texas, as he was studying the virgin LLP forests as they were logged off you find a very different conclusion. In "The Land of Bears and Honey", by Truet and Lay, it states on pages 13-14, "Chapman thought he knew what they would find. The trees would probably occur in large stands of even-aged trees. He knew that fires swept through from time to time, and suspected that the trees would have grown back in large blocks. ... The initial search brought the first surprise. None of his students could find a uniform forty acres. On close inspection each plot showed openings, different-aged trees, and other irregularities. Much of the timber was diseased and old. ... As he rode across this ridge and beyond that stream course, he gradually realized that there were no even-aged stands of trees. And except for a strip that looked like a tornado path, none of the spots of young pines was more than an acre in size. ... Although an extremely intolerant tree (referring to longleaf pine), which will thrive best in even-aged stands, the natural form of this forest constantly trends toward small, even-aged groups of a few hundred square feet. ... The remarkable thing about the stands was not their yield but the size and age ranges of the trees. About 25% of them were less than a foot through - too small for saw-logs. About 25% were young merchantable, twelve to eighteen inches in diameter. Slightly over 30% were mature sawlogs, with trunks eighteen to twenty-six inches thick, and nearly twenty percent were over 26 inches through - for longleaf pines, true veterans. The trees ranged in age from seedlings to over 350 years." This is a far cry from the forest that you describe. We are talking about either group or single tree selection management to mimic this pattern and not even-age management.

On page 13, it is unworthy of the FS to put the blame on private inholdings as responsible for the decline of RCW. The FS has been responsible for managing large areas like the Raven Ranger District or San Jacinto Ranger District and has relatively larger populations. But they were still declining due to FS management when the Judge ruled against the FS in 1988.

Also on page 16, why does the FS limit its actions to "only where the bird currently lives"? Since there are forests and areas where the bird lived historically and in the recent past it seems the FS must also include this habitat as part of the eventual recovery habitat for the bird and ensure that it is managed for



the bird's benefit. Yet you ignore this potential. This makes particular sense, on page 107 and elsewhere in this document where mentioned or discussed, of reintroducing the RCW into the three national forests that currently have no birds. Here is a real opportunity to increase the bird's population in habitat that is ideal for the bird. This is a national decision but the FS punts and says the decision will be made later. This is not acceptable.

The FS's obstinance in wanting to do what is best for the RCW is conclusively shown on page 263 when you say, "there are no known old-growth obligate species", in southern pine forests. The RCW is such a species. An old-growth forest does not mean each and every tree is old. What it does mean is that the forest is dominated by the age process and old age is dominant in the overall processes. This is what occurred in the virgin LLP forests that were described by Chapman and related earlier in this letter. You are not managing for old-growth pine forests because you are not allowing the old-growth (up to and beyond 350 years) to occur.

On page 437, the FS has yet to define the historical ecosystem to use as the goal of its management objectives for the RCW. You must know the historical variability throughout the range of the RCW. We know that old-growth LLP forests are different west of the Mississippi River than east. We know that wiregrass does not occur in Texas and that bluestems take its place. We know that the LLP are in smaller clumps and more mixed with other pines and hardwoods when they grow west of the Mississippi River. But the FS will not develop a management plan that will mimic and bring back the old-growth LLP forest that the RCW needs to survive and make it best in its living niche. You therefore have failed to provide for the optimum habitat that the RCW needs to keep from slowly going extinct.

On page 1 you say, "ecosystem management approach ... restoration of the habitat conditions under which the RCW evolved." What were these? How will you restore old-growth pines? It is already evident from my discussion above that you do not plan to restore these conditions since the trees will not be old enough to easily allow RCW to excavate cavities as easily as they used to. For instance a 350 yr. old tree with red heart disease will be much easier to excavate than a 100 year old tree because, all things being equal, an additional 250 years of red heart disease will have occurred and the ability to bore into this tree is greater. But the FS will not restore the conditions that Chapman described above. So you are not restoring the conditions for old-growth.

15) On page 22, and everywhere else in this document where herbicide use is discussed, I have a concern. My firm concern is the FS's refusal to relook at the Vegetation Management EIS. This document is not set in concrete anymore than any other policy. In fact much has been learned since the document came out about 5 years ago. There is much more information about the toxicity of herbicides and their environmental effects.



The FS needs to relook at this EIS with an eye toward what the massive use of herbicides means regarding this proposal. The FS always requires that selection management has herbicides and yet private landowners who use their lands for timber do not use herbicides on a regular basis. You ought to contact those landowners who do selection management and find out how they are able to grow pine without using herbicides all the time.

I am very concerned about using herbicides and then burning afterward. The combustion products of herbicides, especially herbicides like 2,4-D and 2,4,5-T can create polycyclic aromatic hydrocarbons and other cancer producing compounds. This was glossed over in the Vegetation Management EIS and needs a thorough examination now before the FS commits to it.

I support other methods, rather than herbicides, like leaving more hardwoods and if some must be removed then girdling them so they create snags for woodpeckers and other wildlife. Mechanical methods are best for midstory removal.

On page 239, what are the "other methods of control" that will be used to allow survival of pines? I am against herbicide usage as one of these other methods of control.

On page 241, it is interesting to note here that the FS makes a big deal about stressing the need for herbicide use if selection management is used but that clearcutting and mechanical site preparation and replanting all need herbicides too. Also on page 249 you admit that you may have to use herbicides 1-3 times in a 10-20 year period for irregular shelterwood. This certainly seems like a lot of herbicide usage and I am opposed to this. On page 254 hardwoods can be controlled by mechanical methods and herbicide use is not needed.

On page 284, you fail to note that herbicide use can also cause air pollution. You need to discuss the problem of drift.

16) On page 148 and 266, and everywhere else in this document where fire is mentioned or discussed, I have a concern that the FS is not mimicing the natural fire regime. For instance, nowhere in this document do you discuss in any detail the fire history of each national forest. You need to do this since the lightning strike and native american influences in starting fires was not necessarily the same from the Atlantic to East Texas. Again, you are being overly broad to the point where you ignore possible differences in geographical areas.

You need to state what the fire regime was for each area, what the fire frequency was, what types of fire occurred in each area, what the agents of fire were, what the frequency of fire was for different ecosystems (Longleaf Pine, Shortleaf Pine, Loblolly Pine, Pine-Hardwood), and other factors affecting the area regarding fire. But you ignore this.

My fear is that your 2-5 year burning frequency is too great and again is generalized when it needs to be specific for the ecosystem and geographical region. In the LAC group that I am a part of we are looking at reintroducing fire in the Upland Island and Turkey Hill Wilderness Areas. The fire will only be introduced in the areas with longleaf pine. We plan on initially having one or more cool season burns to ensure that fuel loads are brought back to a more normal level and then about three hot season burns (growing season) in 10 years time. After this a random numbers table will be used which means that fire may occur at any time between 1 and 10 years, for instance. It will not be on a regular basis and it will be such that the mosaic look to these fire tolerant forests will be restored.

But <sup>your</sup> this proposal does not plan to burn like presettlement times where one would presume PCW were much more numerous. You have an artificial fire program which will not mimic what nature did but what you want for commercial pine timber production.

By not burning the majority of the time in the growing season you will not be mimicing nature. In addition you ignore that some species, like Trillium gracilis and Nodding Nixie, will be adversely effected by fire. Those species that are not fire dependent will be reduced in number or disappear. Box turtles and other turtles will die in fires. Indirect effects could be the altering of conditions for some plants which will populate areas where the structure has changed. If there is more sunlight and heat and less moisture there will be more evaporation and a drier habitat. This will make it more conducive for further fires.

If you restore the natural fire regime you should have to burn less frequently because some lightning started fires will then be able to burn while now they cannot start. So you should have less prescribed burning if you restore the proper ecosystem conditions. But you do not say this and it sounds everything will be human dominated instead of assisting nature.

On page 82, why would you propose Alternative A with annual burns when even your most optimistic proposals say only every 2-5 or 2-6 year burns are needed? This seems to be an effort to make this alternative look bad so Alternative E will look more moderate and better.

On page 169, fire does not necessarily destroy young pines. I have seen on the Sam Houston National Forest where fire skips around and creates a mosaic and does not burn certain areas but does burn other areas. Small pines can be in those areas that do not burn. After all nature did okay in growing pines before we got here so why do you act like it cannot do so now?

On page 267 and 269, landscape level effects will not be scattered since 100's to 1000's of acres will be burned. Also many areas near each other will be burned at the same time

so you will have a large cumulative impact. I have seen this happen on the Sam Houston National Forest, San Jacinto Ranger District. When it is burning season large areas are burned as quick as possible since it is felt there is little time in other parts of the year to burn.

I dispute very much your assertion that species will merely move between stands and not die. In fact displacement can often mean death since the carrying capacity of an area will usually be full and any additional animals will either not have enough to eat or have to fight existing territorial animals to get sufficient food. This means that someone dies or is permanently displaced.

You never described on page 269 what species will be hurt by fire (PETS). This needs to be done.

Since this plan is a landscape area plan and since burning will cover a large portion of the area (for Sam Houston National Forest it is about 2/3's of the forest), about 100,000 acres of 150,000 acres, and burning will occur every 2-5 years, how will conflicts with neighbors and air control agencies be reduced? You will be burning more but you say nothing about the difficulty already that your national forests have in burning (Texas for instance). How will you handle these increased impacts due to more burning and more urbanization and incompatible land use in and around the forests? What will these impacts be?

On page 270, you are really reaching here when you say, on the one hand the effects of prescribed fire on fungi is not well documented and then use one single article to dismiss any effects on fungi due to burning. This is totally unscientific and cannot be held up as good science. Shame on you!

On page 285, you ignore that fact that since unevenage management has no prescribed burning there will be less problems with nuisance situations and neighbors and air agencies. You also ignore the differences at the stand and landscape levels that unevenage management will have versus evenage management. You treat unevenage management the same as evenage management when this is not true.

On page 415, it is ridiculous to argue that it is not valid to let nature manage land. It is you fellows that are still trying to put out all wildfires, whether natural or not, on national forests instead of letting nature do what is good for the forest. This arrogance is ridiculous. Not all pine and pine-hardwood forests had 2-5 year fire frequencies. I object to you saying that a let nature manage the land alternative is not possible in wilderness or other areas. We just cannot stand it when we do not manipulate a piece of land. Yet we do not even understand how that piece of land has evolved.

17) On page xxvi, and everywhere else in this document where you discuss or mention SPB, I am very concerned about what you will allow. The fact is, on page 14, that the SPB EIS is 8 years old and is outdated. It does not discuss the destruction of wilderness and scenic areas, and how much do you allow, before the very values that these areas were established for are destroyed. It does not discuss pheromones and how these have proven effective in many tests and should be used, with no cutting, in wilderness and scenic areas as well as other sensitive areas. It does not discuss the horrendous impacts that cut and leave and cut and remove have on the hardwoods left. For instance I have seen huge areas of bark scraped off, trees with their tops torn off, trees with major limbs torn off, trees totally broken in two, wildlife trees, like Black Cherry, heavily damaged or destroyed, huge ruts, nonpoint source erosion, hardwoods that were cut to try to knock pines stuck in the overstory down that had already been cut, denuded areas due to skidders trails, soil compaction, tree limbs dropped in creeks, etc. A host of illegal activities that supposedly were not supposed to happen, that were against FS policy and contract stipulations and yet they did occur, not once, but repeatedly, and no one was fined or in any way really stopped from continuing such travesties. I have seen where logging equipment was moved in wet weather when it should have been left alone and the huge pits that this made. All of this was not discussed in any detail in the SPB EIS. It needs to be because these are very real impacts that are occurring on the ground, every day.

On page 27, although you claim that clearcutting is limited in Alternative E yet SPB cutting is not limited or other salvage cutting and this is just like clearcutting. Certainly the impacts and effects are so similar that there is very little difference.

One other impact I have noted is that PETS, as mentioned above, are destroyed when doing SPB cutting. I saw this with Trillium in Big Creek Scenic Area and the FS had so little information they apparently did not even know Trillium were there. So there is inadequate inventory of areas for PETS. This is another reason why this document should recommend reopening the SPB EIS. Because it does not fully define environmental impacts or mitigate them.

On page 75, I am totally against bug cutting in replacement and recruitment stands. Also on page 121 I am against large scale salvage operations because they destroy a forest. Insect outbreaks are how nature renews a forest and are not bad. It is only because the FS wants a tree farm with very dense tree numbers that SPB do alot of damage.

On page 184 I particularly find it offensive that you think you can slip one over by saying that an 80 yr. rotation age for Loblolly Pine in SPB areas is justified. First you do not define how these areas are determined. In my mind the FS will say all 4 Texas National Forests are such areas and will cut the heck out of these areas. I can see the rest of the national forest doing



the same thing. You have created a loophole that a whale can swim through. You should be able to give a geographical area in acreage and national forests where this will likely be used.

In addition by allowing such a short rotation you ensure that the RCW will not have enough large, old, pines to make cavities in. After all it takes 75 yrs. before quite a few pines have red heart disease and then you propose to cut them down just 5 yrs. later. What are you going to do? Use a lot of artificial cavities? This sure does not mimic nature as you said earlier in this document that you were going to do.

You give no accounting to the natural disturbances that occur today (hurricanes, tornadoes, lightning, wind storms, ice storms, floods, and SPB and other insect attacks) that provide more than enough regeneration and mean that less cutting is necessary.

On page 189, the high probability of catastrophic SPB outbreaks is not defined so it makes it easy for the FS to arbitrarily define this any way it wants to get the cut out and old trees cut.

On page 201 establishing replacement and recruitment stands does have direct, indirect, and cumulative effects. This will allow for SPB cutting and destruction of sensitive species in scenic areas as occurs now. By allowing recruitment stands to grow only to 80 years old they will never have the optimal characteristics that the RCW likes most; that is old trees with advanced red heart disease that are easy to excavate.

On page 218, you ignore the effects of SPB cutting on hardwoods, old pines, sensitive species, and scenic and wilderness areas.

On page 232, you make SPB cutting even worse by allowing planting to occur rather than artificial regeneration. This means that pines not necessarily adapted best to a site will grow on it and that too dense a growth of pine will be allowed which makes for perfect SPB reinfestation. You guys like to complete the loop.

On page 262, you ignore the impacts of the 80 year rotation, that none of the other alternatives have, in Alternative E, on RCW and PETS. This is biasing the document and trying to make Alternative E look no worse than the other alternatives. I object.

On page 298, the FS takes advantage of so-called natural disasters and cuts like heck to sell salvaged timber. This and SPB cutting ensure that unacceptable damage occurs to the forest and the SPB still rage on uncontrolled.

18(4) On page 31, and everywhere else where the FS mentions or discusses recreational impacts, ROW impacts, oil and gas impacts, and other uses, I have the following concerns. It bothers me very much that you will not ban recreation facility construction in RCW colonies. You just say that "if possible" this will not



happen. I have seen what the FS means by this. It means that sure, go ahead and build it.

In the case of Cagle campground on the Paven Panger District of Sam Houston National Forest, the FS allowed the building (it is still being built) of this campground right in the middle of a RCW colony. You can say it was a campground that was already under development but the reality was that no work had been done on the campground to develop it for about 12 years. It was an essentially undeveloped area. But the FS ignored the impacts of building a campground right in the middle of a RCW colony and now the birds will be exposed to all kinds of human intrusions including people with guns, ORV's (one of the major users of the site is expected to be ATV and motorcyclists), auto traffic, campfires, and various other human disturbances (radios, pets, stereos). This is the case that the FS has for RCW in Texas.

On page 116 I am against any rights-of-ways through RCW colonies, recruitment stands, replacement stands. Also on page 95 I am against any kind of equipment and concentrated human use in these areas and against any kind of disturbing activities in any RCW area, whether large or small. I do not want such activities minimized during nesting season. I want them prohibited. On page 136 oil and gas operations, developed recreation sites, lakes, etc. are not compatible with RCW recovery and must not be allowed to destroy RCW habitat. On page 143, I am also opposed to the use of motorized vehicles in RCW colonies, recruitment and replacement stands.

On page 218, there is a high potential for direct effects in clearing for nontimber management purposes. Trees could be damaged, foraging habitat removed, colony, recruitment, and replacement habitat destroyed. The FS needs to commit to buy all mineral rights in RCW habitat.

On page 293, I object to the two consecutive nesting failures allowed. Why should any nesting failure be allowed due to an activity's impact on an endangered species? Also on page 295 define what an "occasional motorcycle or ORV on a trail is". During nesting season construction should be prohibited, period.

18) On page 2, and everywhere else in this document where HMA's and RCW populations are discussed or mentioned, I have these concerns. It is not clear whether the two million acres provided for HMA's is enough and will provide the highest quality habitat for RCW. It also is not clear how isolated HMA's will be linked to other HMA's in national forests or other RCW colonies on other protected lands or on private lands.

It is important to tell in this document how the strategy and policy of multiple-use will fragment RCW populations and other impacts will be identified and managed.

On page 4, Table 1-1 (page 5), colonies (clusters in your terms), should not consist of only a single bird. If they do

then you need to show how many colonies are single bird colonies so the public is aware of how many actual breeding pairs there are with the potential to breed right now. This is a much more valid indication of the breeding status than active colonies.

On page 10, all cutting, no matter for what reason, needs a site specific environmental analysis. This is because cutting is an action that cannot be undone once it is implemented. You have to wait up to a century to undo the damage. Also on page 11 not only has the RCW significantly declined but it is still declining on the national forests and wherever else it is, private lands, state lands, other federal lands; the entire population is still declining.

On page 18, fragmentation must not only be measured by the percentage of suitable habitat with some degree of tall forest cover. It must also be measured by amount of contiguous land that is linked that is suitable RCW habitat. Otherwise your unit of measurement is incomplete.

On page 42, how do you define decreasing, stable, and increasing populations? Also I am against using 400 potential breeding pairs and 500 active clusters as a recovered population. What you need to have is not simply active clusters but breeding pairs in those clusters. So you need 500 active clusters, each with one breeding pair in each cluster.

On page 43, it is not clear how many national forests meet the 75% of historic population range. Please tell us. Also on page 49, where do you get all the excess RCW's for recruitment stands? How many translocations do you plan? Where will they be, approximately? This seems very experimental to me on such a massive scale.

On page 97, since Alternative B, page 93, does not have defined HMA's how can the FS update and maintain a database which includes status category of all RCW clusters within HMA's?

On page 108, while I like the concept of corridors linking populations you spoil this by saying, "if possible". This provides a loophole to not do what is best for the birds. I am against irregular shelterwood (as later related in this letter) because it is unproven and because you will cut 1/3 of the oldest pines 10-20 years before their rotation. RCW need all the old pine they can get right now. I also want maximum monitoring intensity. Also on page 109 you ignore that the 200-400 acre figure is a range for suitable habitat. You are limiting it to 200-300 acres. I want to err on the conservative side by assuming 400 acres of habitat.

On page 115, and other places in this document, you say, "actions that would protect or improve RCW habitat", but after you say this each time in this document you never explain what this means. What are these actions.

On page 159, you need to link all RCW populations together, including those on private lands, and protected federal and state lands.

On page 160, I am concerned that the HMA's will be fragmented by using regular forest plan standards and guidelines with harvest limitations. This will negate the HMA effectiveness. I believe this will lead to RCW isolation and extinction. This is also brought out on page 201 where the areas between the 3/4 mile circles will be managed according to general forest standards and guidelines for 1-3 years and that subHMA's will be allowed to have even more cutting (Alternative E). It seems to me that HMA's will still allow habitat fragmentation outside the 3/4 mile circle due to the poor cutting practices in the general forest standards and guidelines.

On page 221, if 50% of the 3/4 mile circles are nonpine will they be treated to become pine? This is not something I support since you would be wholesale destroying hardwoods when the hardwood removal needs only to be done near cavity trees and cluster sites.

On page 217, I strongly disagree that it is beyond the scope of this document about linking corridors in national forests and other populations. You are supposed to do whatever you need to do to save the RCW. You need to do more than talk in passing of cooperative agreements. You need to tell how many RCW are on other federal, state, and private lands, where these are in relation to RCW's on FS lands, and how these areas could be linked and what will occur if they are not linked, both to the populations that are not on FS lands and those that are on FS lands. Otherwise you do not fulfill NPSA's mandate to look at all impacts. Impacts include those that occur onsite and offsite. How will managing RCW on FS lands affect birds on non-FS lands and how will management or lack of management on non-FS lands affect FS RCW populations?

On page 225, I want to see this 3/4 mile analysis of composition. This study needs to be included in this document and explained. How valid was the sample size and chosen sample areas? I know in Texas the RCW colonies are almost all pine or pine-hardwood sites. They do not have 50% hardwoods in them.

On page 355, spatially arranging groups in a population for viability of the population is not a new tactic. This is already being done by trying to lure RCW out of some wilderness areas. What does adequate genetic interchange through dispersal of juvenile RCW to ensure long-term genetic viability mean? How many are we talking about here? Where do the mileage figures come from? Are they actual figures are estimates?

On page 356, I do not see in the ESA where it speaks of support populations or short-term viability for populations. The ESA talks about permanent viability for populations. Where does the 50% of total number of groups fledgling young annually come from? The FS uses a lot of shoulds in here. What you must say is that you will do something not that you should do something.

On page 356, what if an area is in the HMA but is converted from hardwood or is some type of hardwood? How will it be effected?

On page 328, where did the 5 and 18 mile figures come from? Are they based on actual data or estimations? Also on page 330, suitable RCW Habitat definition is different than the one in the standards and guidelines for RCW or the blue book. Why is it that you include 25 years here when every other document (including the RCW Recovery Plan) says 30 years? See also page 180, Alternative E, where you say that this alternative will provide foraging habitat as described on pp. 50-52, when in fact on pp. 50-52, it talks about 30 year old foraging habitat and not 25 year old habitat. You make a statement that is not true here.

On page 323, under corridor or habitat linkage, what is a "reasonable effort". This is a loophole you can drive a truck through. Also on page 324, how were the demographic isolation values of 3 and 5 miles derived? What factual information are these figures based? The same is true under genetically isolated on page 325. How were the 5 and 18 mile figures derived?

On page 356, if you are going to use clusters on all land ownerships to define population delineations then this EIS must look at private and other non-FS lands and what is happening and how it is effecting FS lands and how FS lands are effecting the non-FS lands for RCW management.

On page 367, the RCW populations in Sam Houston National Forest are essentially split into two populations, one on the Raven Ranger District and one on the San Jacinto Ranger District. They are isolated from each other by major freeways and highways. Therefore they need to each have their own population goals and not a total of 250 groups for both. You need 250 groups for each ranger district.

On page 368, it is not clear why we want to achieve as high a density as possible for RCW. There must be some limits since the birds are territorial. I look at this scheme as one where the FS crowds the birds together so it can cut more habitat and this will also have the effect that if a disease occurs that it has more potential to spread further and faster and do more damage than if the populations are not as dense. How will you ensure that this does not happen?

On page 426, it is important to note that the so-called experts say that no population is unworthy to save. Also that viable populations do not exist. Yet the FS is proposing to allow some populations to go extinct or to not manage as hard for some (supplemental populations or very large populations) than others. On page 428 it says 400 breeding pairs and not "potential breeding pairs" as you say. Please differentiate between these two terms and tell how they are alike and different.



19) On page xviii, and throughout this document where timber management activities are mentioned or discussed I have the following concerns. My overriding concern is that this proposal is simply a thinly veiled attempt to establish a more intensive commercial timber operation under the guise of protecting RCW. The end result will be more pine, less hardwoods, and less overall biodiversity in the forest, when looking at the landscape and the types of organisms that exist on non-FS lands and what organisms are disappearing on all lands.

On page 6, Table 1-2, this table dissatisfies me. The regeneration limits are too large, the rotation ages too short, the goal needs to be to maintain a population increase or stable population level for 5 years before any change of category could occur, it proposes extended rotations as fragmentation prevention when this is not what these do (rotations do not prevent fragmentation, the lack of cutting does), and there is not one word about corridors and linkages. In my opinion this table is a recipe for extinction. Leaving six trees/acres will not be enough to prevent fragmentation and will not result in RCW using these trees because the birds will be more open to predation and the trees will be more susceptible to lightning strikes and windthrow (see what you say about this on page 12, about relics).

On page 7, again in reference to rotation age, it is not clear how this will help fragmentation. Not just an adequate supply of potential cavity trees needed but also the best number for optimal recovery in the shortest period of time. You do not need a maximum diameter for selection management since selection management looks at stands and selects the best to protect for the site and the best to leave to allow for growth.

On page 7, I am totally against using clearcutting for damaged or understocked stands. This is an excuse to cut more. What is understocked anyway? It is what the FS says it is. I am also against seedtree and shelterwood cutting but if you do these you must leave all seedtrees and shelterwood trees, never cut them, and allow natural regeneration only, no offsite use of pines not appropriate for the site. (Naw-se-y)

On page 8, your definition of group selection (see also page 325) is much too large at 2 acres. This is the definition for a patch clearcut. The definition should be 1/8-1/4 acre. This is the traditional group selection size used. Otherwise you do not have a group selection alternative.

On page 23, I am amazed that you do not consider soil and water impacts significant. As clearcutting and other even-age management is practiced to-day by the FS on Texas National Forest these are significant contributors to nonpoint source pollution, compaction of soil, rutting, and other impacts. This will occur on 2 million acres if the FS has its way. This cannot be considered but a significant issue.

In addition on page 23 you try to purposely make uneven age



management look bad. You try to claim that more acres are harvested but this overlooks that the impact is very dispersed and minimized compared to the bombed out look of a clearcut. Also if you include thinnings into the column with respect to cutting under uneven age management and SPB and salvage cuttings which really are clearcuts there are many more entries into even age management areas than uneven age management areas. Also the road system is smaller and less developed and impacting under uneven age management. You also fail to include roads for SPB and salvage cuts. In particular I have found in Big Creek Scenic Area, for instance, the FS says there are no roads. However they enter the scenic area so frequently for SPB that the roads they use for this and then supposedly close are used every year and thus really are part of the forest system road network. But they are not counted as roads under even age management. They should be.

On page 27, Alternative E is the preferred alternative. This supposedly is based on an analysis of the age of existing cavity trees. It ignores that the birds use the oldest trees that they can find and that there are few really old pines; for instance in the 150-300 year age range. This analysis thus is biased in favor of younger aged trees. In reality Alternative E will result in fewer big trees because you will allow 1/3 of the older trees to be cut 10-20 years before rotation is up right at the critical time when the birds need older trees. This for some supposed old tree shortage which ignores areas regenerated by natural disasters like SPB, lightning strikes, fires, windstorms, ice-storms, tornados, hurricanes, other insect attacks, floods, etc. Your preferred alternative is based on bankrupt and faulty assumptions.

On page 27, one of the primary reasons, that RCW are attracted to seed trees, that you do not mention, is that they are older, not just because there is a lack of midstory.

On page 33, the FS arbitrarily removes uneven age management as an alternative. The court ordered plan, which is still in effect, in Texas, has resulted in an increase over about 4-5 years of 50 colonies. It has worked when the FS said it would not. You are violating NEPA by not looking at all reasonable alternatives. You must look at this alternative. You can have even age management with Virginia Pine and the rest be by uneven age management. But you do not want to be fair.

On page 33, group selection can regenerate Longleaf Pine (LLP). You forget, as mentioned before in this letter, that the virgin LLP forests were found in Texas to be uneven age groups. In fact pines have been grown in uneven age management schemes all across the South. Just see the book, "Clearcutting, a Crime Against Nature". In addition the Walker Brothers in Walker County uneven age manage several tens of thousands of acres for commercial pine. When will the FS stop saying something cannot be done when the proof is right in front of your face. I have seen the Walker Brothers lands.

I know that uneven age management works for pines.

On page 34, you say Alternatives B, C, and E allow uneven age management but they do not require it. Therefore they will not be used since the FS has a policy of not using uneven age management. Please compare, in each national forest today, the total number of acres that have been managed via uneven age management versus even age management. This must be shown to show how the FS is biased against this type of management for pine and pine-hardwood types.

On page 35, the FS is ~~at~~ lying when it talks about uneven age management as unproven. It has been used for the last 4-5 years and the result has been a 50 colony increase in Texas National Forests. You use absolutely zero imagination for developing alternatives.

On page 48, what studies demonstrate that leaving 6 snags per acre is sufficient to keep RCW cavities from being taken over by competitors?

On page 53, I disagree that suppressed trees rarely respond to release with improved growth. What is improved growth? Recently, as part of the LAC process for Upland Island and Turkey Hill Wilderness Areas, Larry Shelton cored about 20 old growth LLP, Shortleaf Pine, and Loblolly Pine (most were LLP) that had been killed by SPB in Turkey Hill Wilderness. He found good growth in suppressed trees after they had been released. This was shown by the thickness of the tree rings that occurred directly after release.

On page 58, you say that LLP is especially intolerant of any competition, yet the tree coring mentioned above shows that LLP can be suppressed for years and still grow to old ages (over 100 years in age). This makes these trees suitable for RCW.

On page 61, This illustration and description ignores that the FS mostly site prepares by using tractors and other heavy equipment. This compacts the soil and makes this form of even age management even more environmentally impacting.

On page 62, you say that irregular shelterwood is an untested method for Loblolly, Shortleaf, and Slash and for LLP it fell far short of utilizing the productive capacity of the site. If all of this is true then why are you making an experimental cutting system the very heart of your Alternative E, the proposed action? This makes zero sense. You criticize uneven age management as being unworkable but then you recommend a cutting system that you do not even know will work. This means that the fate of the RCW lies on hopes and not hard scientific facts. I object.

On page 74, you say there is a 120 year rotation for all pines. But Table 2A2 says that Virginia Pine rarely lives to 90 years old so how is this possible? This rotation age, for Loblolly, Slash, Shortleaf, and LLP is not long enough to

establish all old growth structure needed. You need 150 year rotations for Loblolly and 200-300 year rotations for Shortleaf and LLP.

On page 74, you talk-about patch size limitation but then never give one. Please give what patch size limitations there will be and define what a patch cut is.

On page 87, why are you allowing Slash Pine on wet sites at all if this is suboptimum for seedling reestablishment? Why not use some other tree that will be under less stress and thus less subject to SPB attack?

On page 88, how can you possibly use irregular shelterwood when you say that a site specific study must show definite long-term benefits and no short-term adverse effects toward the RCW, when this type of cutting is not even proven to work yet? It seems to me you are setting things up so that irregular shelterwood will not work so you can say we have to go back to clearcutting, seedtree cutting and shelterwood cutting. I think you have erected a Trojan horse that you will use to hide your real intent.

On page 90, the document, "Managing Southern Forests to Reduce Southern Pine Beetle Impacts", that is noted is not in the bibliography. Why?

On page 123, be clear about what you mean when you talk about pine restoration. You mean more logging, plain and simple.

On page 127, you say that irregular shelterwood is acceptable but you stated earlier in this document that it had never been proven. How can this be? I also believe firmly that you can do single tree selection for LLP, Loblolly, and Shortleaf. I have personally seen it done for Loblolly on Walker Brothers' land.

On page 129, you talk about when clearcutting is allowed. You do not mention the effects of SPB cutting and what role this will play in this site specific study.

On pages 131 and 132, I find it interesting you give a lot of illustrations for irregular shelterwood but none to group selection. Why is this? Also you do not do the same for single tree selection, seedtree and shelterwood and clearcutting. How come? You are biasing this document by giving more analysis to one alternative, irregular shelterwood, than to the other alternatives. This is illegal under NEPA and the CEQ EIS regulations.

On page 137, sustained flow of RCW habitat through time cannot be assured. Define what time period and why not? On page 152, the FS makes the ridiculous assertion that since there is no planned regeneration of forest stands and therefore no sustained production of cavity trees can be assured over 100's of years. How in the heck did nature propagate LLP and other pines before we started cutting them down? You forget about the longevity of trees if you let them alone and do not artifi-

cially terminate their lives.

On page 166, 25-40 acres is not a patch cut. This is a very large cut. Forty acres is what the Texas National Forests practice now. I do not see this as any improvement over what is occurring now.

On page 181, I am totally against cutting any old pines before their rotation is up. You are ensuring the RCW demise. You ignore that regeneration will occur due to natural disasters as mentioned before in this letter.

On page 196, define what "substantial credible information" is. What makes it credible and what makes it substantial? How is credible defined?

On page 198, you say that the S&G have halted the decline or slowed the rate of decline of RCW populations. Please discuss in an overview which, where, over what time period, and where the increase, decline, and stable populations are so that the reviewer has this information and can make an independent assessment.

On page 198, 42% of the populations declining is not a bright prospect. It is scary to read that on page 199, only 10% of the pine and pine-hardwood stands on 11 national forests are old enough to provide potential cavity trees. This seems to argue against cutting any old trees. I am concerned about using unpublished data. All information needs to be peer reviewed. The plan to cut out all hardwood by midstory control is frightening. It is interesting that here it reads that "lack of midstory treatment in foraging habitat can be of some importance". What does some importance mean. What percent of the hardwoods are we proposing to cut here?

On page 199, this plan cannot be developed in isolation looking at only 51% of the RCW colonies. What about the other 49%? You need to determine how they will be effected and how they will effect RCW colonies on FS lands. In addition on page 199, fragmentation is a production of not just past management practices but present ones as well. For instance, salvage and SPB cuts that fragment around a colony.

On page 200, it is very disconcerting to hear the FS say that it will consider just, "those management activities which are most critical to recovery of the RCW". Under NEPA you need to look at cumulative effects so you cannot ignore activities that will cumulatively impact the RCW. You have not stated what you are not looking at so the reviewer will know what you are ignoring.

On page 205, you need to discuss site preparation as detrimental to forest flora and fauna, microbe populations, soil and water quality, etc. For instance, recent information from

Oregon indicates that clearcutting ~~can~~ biologically destroy soils. Enclosed is an article from Science about this. Please discuss the impacts that all forms of cutting will have on these microbes. Also enclosed is a copy of a paper from Conservation Biology that calls into question whether herbaceous plants ever do recover from clearcutting. While the study was in the Appalachian area its results should be discussed with respect to Southern National Forests and sensitive herbaceous species.

On page 206, you say clusters will be considered foraging habitat but on page 204 you say clusters will not be considered in this discussion. Please clarify. Which are they.

On page 207, it is ridiculous to say there is no direct effect of establishing rotation ages. This sets the stage for what cutting will be allowed and whether true old growth conditions (trees at least 300 years of age) will be allowed to occur.

On page 207, again you show that irregular shelterwood will not work. So why do you propose it?

On page 208, since wind loss was higher with trees 50 years or older it appears that rotation age, after a certain point, has the same effect or similar effect. Therefore, since RCW need trees as old as possible there is no reason to not allow such trees to grow to 300 years because the wind similarly affects these as a 50 year old tree.

On page 208, the FS shows its bias by giving a really bad description of Alternative D. You claim all sites will degenerate but you again ignore natural regeneration due to natural disasters. There will be more than enough natural regeneration. How do you think nature did it without us?

On page 211, thinning also results in loss of trees. These trees can be either pine or hardwood since cutting can result in scraping bark and causing disease or insect attack or trees can be felled directly on other trees and kill trees. This does occur all the time.

On page 212, when you cut and leave a small clump of trees it will not be usable by the RCW for a number of years because there will not be enough forage around it for a colony. In addition the trees in the clump will be more susceptible to windthrow and lightning strikes and fires.

On page 212, I disagree about the direct effects on RCW will be minimal with seedtree and shelterwood. There will be little original cover left, less foraging and potential cavity trees and there will be more possibility for predation due to lack of cover. The predation issue is totally ignored in this document.

On page 214, natural losses will allow young pines to regrow.



On page 216, uneven age stands should be no more susceptible to wind damage than even age. All stands, no matter what the cutting method will have other different age stands next to them. Also there will be plenty of diameter for uneven age management since there is no rotation age and 200-300 year old trees are not unusual.

On page 220, I am not aware that there is a dearth of habitat for early successional forest species and that they are declining. There are certainly enough clearcuts, seedtree cuts, shelterwood cuts, SPB cuts, salvage cuts, roads, wildlife food plots, powerline and pipeline ROW, and other cleared areas in national forests in Texas. You are not looking at the entire landscape. Shame on you.

On page 221, you are ignoring the impacts of even age management on herpetiles like salamanders and how the cutting and site preparation destroys local populations. On page 223, you are coping out by not addressing the impacts the FS has had on the land over the last 50 years, for instance, in Texas. For the last 50 years you have managed the land in Texas National Forests. If there are any species that are PETS due to cutting and logging activities it is because of the FS and no one else. If fire has decreased 95% it is your fault because you did this. Do not try to blame the public. You started the Smoky the Bear Campaign, not the public.

On page 224, you ignore the effects of timber activities on each specific species. You say the "degree of the effects depends on the management activity, intensity of activity, timing of activity, and biological requirements of the species" but then you do not address this for each ~~for each~~ PETS.

On page 225, you are strangely silent about the impacts of forestry activities on herpetiles. Why? Also on page 226, you ignore salamanders and other amphibians, turtles, the Big Thicket Dragonfly, orchids, Trillium, etc. You totally avoid talking about specific impacts on specific species. You are not revealing, as NEPA requires, what the environmental impacts are.

On page 232, you have a selective memory about the public's interest in the national forests. The public started getting upset in the 1960's, not the late 1970's. Why do you think the MUSY act was passed and NEPA, and the NFMA, and the RPA, all of which had roots in the 1960's, not 1970's.

On page 232, let us be honest, the claim for a 70% reduction in clearcutting is bogus. Seedtree and shelterwood do the same damage as clearcutting. Plus you're forgetting the SPB and salvage cutting which essentially is clearcutting. And site preparation is often done after any even age management so this makes it even worse. You guys really get ridiculous on page 233 by complaining about having 20-30% hardwoods. It is obvious that if you could you would get rid of hardwoods.

On page 235, which plants require full shade? Which species are dependent on dense pine stands? Which are more numerous? Which has habitat throughout its range disappearing?

On page 239, what native plant communities would be reestablished?

On page 241, you need to note that clearcutting results in destruction of hardwoods, scraping of bark, compaction of soil, loss of microflora and fauna, loss of herptiles, erosion, nutrient losses, sun scald of remaining trees, broken roots, etc.

On page 243, define the phrase, "adequate LLP regeneration was not retained after 35 years". Is what was left enough for RCW survival? Also when you say that young LLP are effected by adults explain what you mean. Does this mean that they die all the time or are they simply suppressed and grow slower?

On page 246, again the bias for irregular shelterwood is shown by the amount of print you spend talking about it versus the other cutting methods. What is wrong with falling far short (define what this means) of fully utilizing the productive capacity of the site? So what? Does nature do it this way or are you concerned because you cannot grow as much commercial pine? I also find it interesting that only now do you admit that irregular shelterwood may not supply/steady flow of RCW habitat in the long-term on many acres. You have been saying this about uneven age management for a long time. How can you even propose irregular shelterwood with so many unknowns. You made a negative out of this supposedly for Alternative D. If this is true for irregular shelterwood and this is to be the main form of cutting then Alternative E also will not provide sufficient habitat. Again, why are you recommending extensive use of an unproven cutting method? Are you really saying that irregular shelterwood will not work and you will use clearcutting, seedtree, and shelterwood?

On page 250-253, you talk about removal cuts and the damage that can be done due to them with irregular shelterwood. But when you talked about uneven age management you talked about such cuts every 10 years and made it sound so bad. But you ignore that with irregular shelterwood you will have alot of thinning cuts which will have the same or similar impacts. You are not being fair here in comparing the two cutting methods.

On page 255, you say that more young pines are killed with uneven age management. But you ignore that the FS has purposely killed all naturally regenerated trees in the Four Notch Area in Sam Houston National Forest so it could replant with nursery pines. You also ignore ~~that~~ damage that thinning does to young trees. On page 259, the existing biodiversity is also due to too much acreage being planted to pine and the FS's policy about cutting and planting and site preparation. These methods reduce biodiversity because the emphasize common early successional and edge species to the detriment of rare or less common interior forest or late successional species.

On page 270, you state there are no direct effects of thinning. Thinning can kill or damage other trees, this reduces the productivity of the site, soil compaction occurs, soil erosion and nutrient loss occurs especially at skidding trails and log landings, an increase in temperature and sunlight and a reduction in moisture and increase in transpiration will result. You name no species that will be effected like forest interior species like Trillium. The natural forest also thins but does so in a much more environmentally sensitive manner and creates more snags. On page 271, thinnings do not provide stability for understory because you will burn and remove the understory. In addition thinnings will destroy a good portion of the understory due to large trees falling on the understory trees.

On page 271, thinning also impacts at the landscape level. In cumulative conjunction with SPB cutting, Salvage cutting, and regeneration cutting along with road building impacts you destroy and fragment the forest interior.

On page 275, you proclaim that all alternatives have the same landscape effects. But uneven age management will be more sensitive and less obvious because you have no large gaps in the canopy and thus the microclimate is more effectively protected.

On page 276, deer and turkey may also not use interior of Alternative E cuts. 25-40 acres is a large area and will, in a few years be an impenetrable thicket which most wildlife will not use. Also hawks and owls do not need openings as large as 25-40 acres. You claim that uneven management may mean reduced foraging effectiveness for raptors but you ignore all disturbances added together, cumulatively, which will be more than enough for such species. After all these species thrived in the virgin forest before we cut it. In addition even age cutting creates larger openings which means a greater possibility of windthrow or ice damage since the canopy is broken in a large area.

On page 276 and 277, uneven age management will also create early successional habitat scattered across the landscape. This is done by cutting and disturbances. Also early successional birds will not be eliminated because of disturbance (hail storms, wind storms, ice storms, lightning, fire, floods, hurricanes, tornados, SPB, root rot, other disease and insect attack, etc. This creates early successional habitat for birds that need openings.

On page 411, large scale disturbances can happen. But what occurs much more frequently is small scale disturbances, which dominate the forest, provide most of the disturbance mosaic, and habitat. Even age habitat in large areas is not the norm for our area. This is not Lodgepole pine country. All ages are left in the forest with these small scale disturbances. Silviculture as practiced now focuses on large scale disturbances and not small scale ones.

On page 416, only certain forage, fruit, and seeds would be increased by even age management. Others will be increased by uneven age management. Discuss the differences between these two and what forage, fruit, and seeds would increase or decrease in both. On this page you use information based on single species management, like for deer or turkey, or the RCW. Where is the ecosystem management you proclaim you will follow? You ignore all cutting except regeneration cutting. Yet the other cutting will occur too and impact an area. You still do not say what the cumulative effects are of all cutting in an area.

On page 417, the FS intensively site prepares all the time in Texas National Forests. You talk about there not being direct impacts due to site preparation but the subterranean species, those amphibians, reptiles, small mammals, etc. are killed in the entire area. That is direct and final. Be honest with your assessments.

20) On page 219, and everywhere else in this document where biodiversity and PETS is discussed or mentioned, I have a number of concerns. In the past wildlife management by the FS has not stressed maximizing diversity. It has focused on game species management. Too much emphasis has been on clearing, edge, and early successional habitat and there has been a lack of burning that mimics nature in appropriate areas. That is one of the reasons we have so many PETS. Species richness does not equate to ecosystem health. The FS has brought generalists into niches where specialists are and has changed conditions (interior forest species) so they have a hard time competing. This will still occur with your plan.

On page 259, you keep talking about species associated with RCW that are PETS but then you do not specifically name these and tell how they will be benefited. You also do not name the species that will be hurt by RCW management and how this will occur and what the decreases mean for the overall health of each of these species.

On page 260, the FS does not know much about displacement of organisms. This can only occur if the carrying capacity of the surrounding habitat that is suitable for a species is not full. This assumption cannot be made unless the FS has data to back this up. Otherwise species will not simply be displaced but will die because they cannot compete with already established individuals who are defending their home territory.

On page 262, it is not clear how many of the species on the PETS list are early successional species. Please list them and then talk about how they will be helped by the management you proposed. You are ignoring here the impacts that a loss of hardwoods has on species. You need to detail these impacts also. It seems like, on page 264, you are only focusing on the total number of species and not the quality of habitat and whether rare



species of all kinds will fare well under the conditions you will create. In particular your focus on early successional species or species that are not really forest species is limiting and worrisome. For instance, on page 267, you focus on bobwhite quail. Yet ~~these~~ species is not really a forest species and there is not need to focus so much effort on trying to keep bobwhite in all areas. Yes they have been decreasing in areas but this is because of not only forest habitat coming back but also because present plantation management is not being done for bobwhite survival.

On page 267, to say that 100 PETS will benefit from your management is a pretty bold statement to make. If you are to make such a statement then you must back it up with facts, research, and studies. You need to show how each of these PETS will benefit from prescribed fire. I know that Trillium, which is not on your list, but should be, will not benefit. I also know that Nodding Nixie will not benefit. You cannot make such assertions without data to back it up. Provide this data.

On page 271, it sounds like here you are ignoring species diversity at the landscape level and only talking about total numbers of species. What about quality of habitat and the dispersion of habitat? It seems to me that forest interior species are being given no real assessment of impacts in this document.

On page 273, as mentioned before home range shifts and displacement can often result in death. A lot of organisms like small mammals, snakes, frogs, toads, salamanders, turtles, lizards, insects, arachnids, protozoans, fungi, moss, lichens, liverworts, etc., will be destroyed, not displaced due to logging, bulldozing, burning, plowing up, compacting, and replanting. A good example of this in Texas National Forests is that logging activities nearly wiped out one of the few populations of Yellow Lady Slipper Orchid in Texas in the national forest.

On page 273, who will monitor, and how, to see that small mammal, bobwhite, deer, turkey, and other animals in fact do increase or benefit and that squirrels do not suffer and other animals do not suffer? How will this be done?

On page 274, raptors have enough foraging efficiency in uneven age management. There still are clearings due to the cutting and natural disturbances. Some raptors, like Coopers Hawk and Red-Shouldered Hawk like older growth forests. There will not be less food produced because there will be a mosaic in uneven age management too and this will create better structure, have all age classes, and more niches will be provided.

On page 274, a Blue Jay is not a late successional species. One of the very papers you quote, "Bird Communities Associated With Succession and Management of Loblolly-Shortleaf Pine Forests", states on page 59, that the Blue Jay is an edge species. There are no dearth of early successional species but there is a dearth of late successional species due to a lack of habitat.



On page 274, how intensive will site preparation be? You can easily estimate this based on what is done on national forests today for each national forest.

On page 412, humans do not know enough to practice active management and get a good ecosystem management scheme implemented. It is the forest interior and shade tolerant species that are being impacted and whose habitat takes decades if not centuries to create. These are the species that have both long and short-term existence problems. On page 413, again you simply focus on the number of species present and not on what their range is, the quality of their habitat, can they continue living for long periods of time if the present impacts keep occurring, where is the interior forest habitat and old growth habitat going to come from if the FS does not provide it? On page 414, it is a mistake to think we have extensive homogeneous habitats. Our habitats are fragmented with more early successional and edge habitat than forest interior and old growth habitat.

On page 322, the glossary does not even include a real specific definition. Why are you afraid to firmly pin down a definition. My definition is as follows, "Biodiversity is the variety and richness of living organisms and the ecological complexes in which they live. There are several levels of biodiversity: species, genetic, ecosystem, and landscape." I request you spell out your definition more precisely.

21) On page xxii and xxiii, and everywhere else where timber economy and jobs is discussed, I have the following concerns. Why were the years used which are listed (1987-1989)? Why were not earlier or later years data used. Were these high timber cutting years for the national forests in the South? Why were employment figures of 1988-1989 used. These do not coincide totally with the timber cutting years mentioned previously. Also on page 299 the years 1988-1991 are used. You are not being consistent by comparing economic information using the same years. This makes it difficult to really understand the contrasts between different alternatives.

On page 301, it is important to note that extending rotations can also increase the value of timber since private industry does not grow old sawtimber as a rule. On page 303, what point in the future (number of years) will Alternative D timber values drop well below what is on Table 3-12? I am also concerned that payments to counties is only for one year (1992-1993) and again is not the same year span that you have for the other economic and timber factors you are comparing. Was that year a good or not good year for such payments? Also what is the price/MBF for 1987-1991, for each year, and then the average for the entire time period?

22. 22) Now I will cover some miscellaneous questions and comments I have.

On pages xxxi and 97, the FS illegally modified the FS Handbook twice for the RCW with no Fish and Wildlife Service consultation. Who was responsible for these illegal acts and have they been punished? How can we trust that the FS will not try similar things in the future? What have you done to ensure that such illegal actions do not occur again? What mechanisms have you instituted to prevent such occurrences? I also believe that on page 97, the FS must consult with FWS formally before any cluster is declared abandoned. This ensures that those with a self-interest do not do all the monitoring.

On page 26, it is ridiculous to assert that the court ordered RCW plan that has worked fine in the Texas National Forests does not meet the needs of the RCW or meet one of the issues considered when you have the alternative, like the standards and guidelines, which will not result in long-term RCW recovery and Alternative B will result in economic values taking precedence over proper RCW management. Then you say that, "All alternatives have addressed on or more issues of public concern previously identified in Chapter 1". Well if you have eliminated alternatives that did not consider public issues or concerns but you keep alternatives that addressed "one or more issues of public concern", what is the difference? You have ignored the scenic area issue in all alternatives and yet this was a public issue that was brought up in scoping comments. Yet on page 290, you talk about impacts on wilderness areas but ignore scenic areas. Since scenic areas have a different purpose than wilderness areas they also need their own discussion.

On page 94, Table 2-B1, has the Sam Houston National Forest marked with a star but there is no explanation why it is so marked.

On page 94, I agree that firewood permits must not be allowed in clusters.

On page 290, why do all the alternative except Alternative E have the essential colony requirement? Why cannot other alternatives not have to have this and allow RCW to be lured out of the wilderness?

On page 288, there is no real discussion of what the cumulative impacts of oil and gas drilling are on RCW. For instance in the Sabine and Davy Crockett National Forests in Texas huge areas of potential RCW habitat have been totally fragmented by mineral development. When will the FS stop allowing this. No EIS has ever been done on cumulative impacts of these developments. Why?

On page 323, cumulative impacts demand looking at private and nonfederal lands. What has happened to the RCW on these lands and how does it affect FS lands and how do FS lands effect these lands? This needs to be in your definition and in this EIS.

On page 324, I am concerned about the destroyed cluster definition. Only one survey is enough. It should be mandated that all destroyed clusters get inserts and be protected unless there is no habitat to protect.

On page 327, mitigation measures also include avoiding impacts.

On page 415, wilderness was never envisioned as being a totally active managed environment. You are supposed to let nature be dominant and have human imprints not visible or almost not visible. You are proposing to make human imprints very visible. This is in direct violation of the Wilderness Act. I object!

On page 444, how will a site for possible augmentation be evaluated? Give the criteria used and the process used.

On page 444, I strongly support to use of repellents for SPB control. The FS has and still does ignore this. This is one reason why the SPB EIS needs to be reopened so that Wilderness Areas and Scenic Areas can be protected using this method with no cutting.

On page 447, there is a suggestion of areas with RCW where timber harvesting is limited. It is not clear that any such areas exist under this plan because all will be subject to some harvesting at some point.

Because of all the flaws in this EIS I request that the FS redo the entire document and put it back out for public input. I request a copy of the FEIS and any associated documents and request that I be kept on the mailing list and be kept abreast of the progress on this document. Thank you.

Sincerely,

*Brandt Mannchen*

Brandt Mannchen  
1301 Richmond Ave. T-2  
Houston, Texas 77006  
H713-521-9534, W713-640-4313

Attachments (not included here) to Comment Letter #144 (Brandt Mannchen)

Attachment 1 - Letter - Brandt Mannchen

Attachment 2 - Letter - Sierra Club, Lone Star Chapter

Attachment 3 - Notice of Appeal

Attachment 4 - Letter - Compartment Map - #106

Attachment 5 - Article - Soil Effects of Clearcutting

Attachment 6 - Article - David Cameron Duffy, "Do Appalachian Herbaceous Understories Ever Recover from Clearcutting?"

145

March 18, 1994  
40 Gentry Cove  
Grenada, MS 38901

Re RCW 3/22/94

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W.  
Room 718N  
Atlanta, GA 30367

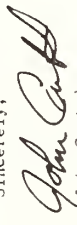
Dear Mr. Dabney:

As a citizen who is concerned about governmental intrusion into many aspects of private life I am extremely troubled by the various alternatives outlined in the RCW environmental impact statement. And while I support the idealism implicit in environmental matters, I strongly disagree with the attitude of the extremists who place the affairs and needs of our country's citizens after the perceived needs of things like the Red Cockaded Woodpecker. Yes, the RCW needs help. No, the needs of the RCW are not superior to those of humans. The RCW EIS as written is totally unacceptable because its recovery goals are far too extravagant and the habitat management measures required in the plan are far in excess of what is necessary to recover the bird.

Alternative E, with major changes, is marginally acceptable. For example, the recovery populations for the Bienville should be decreased to 300 to 350 colonies, the rotations must be reduced to 70 years for loblolly and 80 for longleaf and be used in conjunction with artificial cavities and the designation of small recruitment stands, all lands should be eliminated from foraging habitat except that needed for the current population plus that necessary to accommodate the expected population increase for the next 10 years, all references to the modified shelterwood system of forest management should be dropped and normal silvicultural practices used to manage the bird, you should exclude translocation of any colonies within 3/4 miles of private lands, and the Chickasawhay District should not be designated as a recovery unit.

Once again, I strongly support the U. S. Forest Service in its efforts to manage and protect the RCW, but it must be done in conjunction with meeting the needs of our citizens and our economy. It is only with a strong economy that we can afford to spend the time and effort to recover species like the RCW, and, if we continue to ignore the economics of recovery actions, we will find that both we and they will be worse off than we were before we began. I appreciate your consideration, and I hope you will consider these suggestions when making the final decision.

Sincerely,

  
John Cantele

cc: U.S. Representative Bennie Thompson  
U.S. Senator Thad Cochran  
U.S. Senator Trent Lott

Response to Comments in Letter No. 145

From: John Cantele

Comment No. Response

1. Please see comment letter 37.



Mississippi  
**Federal Timber Council**

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road N.W., Rm 718N  
Atlanta Georgia, 30367

Dear Mr. Dabney:

We appreciate the opportunity to comment on the Red Cockaded Woodpecker Environmental Impact Statement.

First, let us applaud the Forest Service in its efforts to manage and protect endangered species. We also recognize and appreciate the excellent manner in which the Forest Service has discharged its duties in managing the national forests here in Mississippi over the last 55 years.

Being involved in the Forest Products Manufacturing business we are naturally concerned about the impacts this plan will have on timber outputs from the national forests over the next several decades. Our goal is to work with you to prevent a disaster in our business such as happened with the Spotted Owl in the Pacific Northwest. We firmly believe that National Forest Lands in Mississippi are capable of sustaining a viable population of Red Cockaded Woodpeckers while at the same time producing timber volumes equal to or greater than in the past. The plan, as written, however, does not reflect this. Also, we do not believe the plan accurately reflects the intent of Congress in management of National Forest Lands in that the management of other resources will be secondary to the RCW and other resource outputs will be incidental to RCW management.

In analyzing the EIS, as well as an exhaustive review of literature and research conducted over the last 30 years, we are convinced that the recovery goals are far too extravagant and habitat management measures required are far in excess of that necessary to recover the bird. To rectify this we request that you make the following changes in alternative E of the EIS:

(1) Rotations

Alternative E requires rotations of 100 years for loblolly and 120 years for longleaf except in areas of high southern pine beetle risks. Actually rotations are much longer since the EIS requires that past regeneration practices be taken into account. The National Forests in Mississippi have been managed on rotations of 50-70 years for the last 30 years. During this time a substantial amount of regeneration has occurred. Under the preferred alternative 10-30 years will be required before any appreciable amount of sawtimber can be harvested.

Response to Comments in Letter No. 147

From: John Behan, Mississippi Federal Timber Council

Comment No. Response

1. Please see Letter #37, Comment #2.
2. Please see Letter #37, Comment #1.
3. Please see Letter #37, Comment #3 and #4.
4. The selected alternative does include the use of clearcutting as a silvicultural tool. Clearcutting is permissible to regenerate Virginia and pitch pine, understocked or damaged stands and stands being restored to desirable pine species for RCW.  
Please see Letter #119, Comment #1.
5. Please see Letter #33, Comment #60.
6. Please see Letter #33, Comment #6.
7. Please see Letter #33, Comment #7.
8. Please see Letter #33, Comment #8.  
While current habitat conditions will vary from one HMA to another, those areas selected to provide for recovered populations represent the long-term commitment to eventually declaring the RCW recovered and removing it from the Endangered Species list.
9. The tentative HMAs represented in the FEIS were established upon the presence of active RCW clusters as of 1986. There were no known active RCW clusters on the Tombigbee National Forest in 1986, therefore the FEIS does not require the establishment of a HMA. However, a National Forest within the range of the RCW has the option of establishing a HMA if it so chooses. This is an issue which would be addressed within the the Forest Land and Resource Management Plan process.
10. Pine restoration in the selected alternative emphasizes returning those pine species preferred by the RCW, such as longleaf, to those sites where they occurred prior to the cut-over logging that occurred during the early 1900s.  
See also Letter #33, Comment #37 and #46.

The preponderance of research currently available, very clearly suggests that rotations in excess of 70 years for loblolly and 80 for long-leaf are not absolutely necessary if used in conjunction with artificial cavities and recruitment/replacement stands. The concept of artificial cavities has added a new dimension to RCW management which should result in a reduction in the amount of older timber needed for resting habitat. Yet there seems to be a reluctance on the part of the Forest Service to accept this fact. We believe the Francis Marion National Forest serves as living proof of this. As you know prior to hurricane Hugo that population had steadily increased for many years. This increase came during a period when normal timber management practices, including clear-cutting, was carried out in a very aggressive manner with rotations of 70 years or less. As you know this population, in spite of heavy losses of cavity trees from Hugo, has been virtually recovered with the use of artificial cavities.

According to published data, before Hugo, 62% of the loblolly cavity trees on the Marion are less than 80 years old and only 2% of the long-leaf cavity trees are over 100 years old. While we do not have the numbers it is safe to assume that these trees were colonized at much earlier ages. About 67 percent of the cavity trees on the Bienville National Forest were less than 68 years old when first colonized and some were as young as 43 years.

To impose such long rotations over the entire habitat area results in much more habitat than the bird can possibly ever utilize. Consider the following: On the Chickasawhay unit there are two colonies. The average life span of the bird is 3-4 years and the average breeding pair has an average of about 1 fledgling per year. Of these, one of every three do not survive. Within 1/2 mile of each colony site there are currently more than 12,000 trees over 56 years old available for cavity construction. Given the fact that it takes 1 to 4 years for birds to construct a cavity, one can readily see that the bird is being provided for, much in excess of its needs.

Using the rotations suggested above (in the average loblolly compartment in Mississippi) there would always be two age classes over 50 years totaling about 136 acres. Since most stands on the National Forests in Mississippi contain an average of about 50 trees per acre there would always be over 14,000 trees available for nesting habitat. Even if the 50-60 age class were discounted, still over 7,000 trees would be available. Given the fact that the average colony site contains no more than 10-15 trees, this would appear to be ample habitat.

Rotations must be reduced to 70 years for loblolly and 80 for long-leaf and used in combination with artificial cavities and designation of small recruitment stands. These rotations and recruitment stands will result in a perpetual supply suitable habitat and the use of artificial cavities will serve as insurance in expanding the population.

## (2) Population Objectives

There are two designated recovery populations in Mississippi, the Bienville and the Chickasawhay. The Homochitto and DeSoto populations are considered support populations. Currently the Bienville population contains 90 colonies and the Chickasawhay population contains 2 colonies. In order to have 250 successful breeding pairs, Forest Service Biologists say 500 colonies are needed. This is inconsistent with the recovery plan and also is not supported by research. Research conducted on the subject by Franklin and Soule in Florida in the 1970s suggest that 250 breeding pairs are needed to perpetuate the proper genetic variation. The actual number of colonies needed depends, to a large degree, on the demographics of individual populations but most experts agree that no more than 300 to 350 colonies are needed.

The recovery population objective for the Bienville must be decreased to 300 to 350 colonies.

## (3) Foraging Habitat

We are especially concerned about designating foraging habitat, at the time of plan implementation, for the entire population objective. Since Mississippi has been assigned a population objective of 1,430 colonies, over 150,000 acres will be designated upon implementation of the plan but would not be needed until the bird expands into the area. Since some Mississippi populations are declining and others are static or perhaps increasing very slowly, it is clear that only a very small portion of the foraging area will ever be utilized. In the meantime, no regeneration is allowed (for at least 10-30 years depending upon the amount currently in the 1-10 age class) nor any thinning that would reduce the basal area below 70 square feet per acre. These guidelines, for the most part eliminate these lands from sawtimber production for the next 10 to 30 years. This is very impractical, unrealistic and unnecessary.

The plan requires that 6,350 pine stems greater than 10" in diameter be designated for each colony. Even if the birds were present there are studies, as well as on-the-ground examples, which show that this many stems are not needed in all cases. Examples are the Hurricane Hugo area in South Carolina and unpublished foraging studies conducted in Florida. In addition, Alternative E recognizes only pine and pine hardwood stands over 30 years old as suitable foraging habitat, yet research shows that birds forage in pine plantation, agricultural fields, utility rights-of-ways and even logging debris.

To be acceptable alternative E must be changed as follow:

--Eliminate all lands from foraging habitat except that needed for the current population plus that necessary to accommodate the expected population increase for the next 10 years. Normal forest

practices including 70-80 year rotations, should be conducted on the lands eliminated except recruitment and replacement stands would be designated and all relic trees retained. This process would be re-evaluated after 10 years to determine the need for additional foraging habitat.

--Reduce the minimum age of acceptable foraging habitat to 20 year old pine and pine hardwood stands. Also, recognize agriculture fields, pine plantations under 20 years old, utility rights-of-way, etc., as supplemental foraging habitat. Supplemental habitat should be recognized on a 2 for 1 ratio to regular habitat. (Two acres of supplemental habitat would be substituted for each acre of regular habitat). This will effectively reduce the acres of older stands needed for foraging.

These measures coupled with the rotations suggested above would insure that proper habitat is maintained for any reasonable expected increase in birds while at the same time allow harvesting of some timber. We believe this would more nearly meet the congressional intent in managing National Forest Lands.

#### (4) Clear-cutting as a Harvesting System.

There have been several studies documenting that clear-cutting, conducted in a responsible manner, is not detrimental to the habitat of the bird. Yet clear-cutting, as a silvicultural tool, is prohibited under alternative E except as a means of changing forest types. Using the rotations suggested above, we do not believe there is sufficient biological justification to preclude the use of clear-cutting. We believe there is an attempt here to use this document to solve a political issue or to bring about reform in the way National Forests are managed.

To be acceptable, alternative E must include the use of clear-cutting as a silvicultural tool.

#### (5) Irregular Shelterwood Silvicultural System.

The preferred alternative speaks of a silvicultural system called irregular shelterwood. This is an untested silvicultural system and a very dangerous RCW management tool. It will tend to lure colonies from the relatively safe confines of open pine stands into areas with 6 trees or less per acre, most of which will be gone from lightning or insects and diseases within a few years. In addition, the pine regeneration will quickly grow into the mid-story thus restricting the movement of the bird during foraging as well as ingress and egress to cavity trees. Since the mid-story pines must be removed, the long term habitat requirements of the bird will not be met.



Alternative E must drop all references to modified shelterwood and instead use normal silvicultural practices to manage the bird. This was done with very few modifications, during the growth of the only two successful populations in the South, i.e. South Carolina and Florida.

(6) Harvest Levels

The table on page 29 displaying the reduction in harvest levels, is at best, highly suspect. Since the impacts are displayed regionally rather than by states it is very difficult to determine what the impacts are to Mississippi. Table 2-1 indicates a 27% drop in sawtimber harvest levels with alternative E for years 1-10, a 24% drop in years 11-20 and a 16% drop in years 21-30. Our analysis clearly shows that the impacts are grossly understated. The ramifications of not revealing the true picture by individual forests could be very serious. There are many timber purchasers who depend upon National Forests as a long term raw materials supply. They invest in new plants and new equipment based on National Forests providing timber. The average reader of this plan may make the interpretation that the proposed action would result in only minimal impacts when in fact the impacts are very serious.

Alternative E must accurately disclose to the public the sawtimber and roundwood volume that will be withheld as result of the implementation of this plan on a state by state basis.

(7) Red Cockaded Woodpecker Management Activities Adjacent to Private Lands

The plan places no restrictions on Forest Service management activities adjacent to private lands. Under the proposed RCW management guidelines for private lands, landowners must provide foraging habitat, consisting of 3000 sq. ft. of basal area for each colony, preferably within 1/4 mile of the colony site. Serious consequences could result from the Forest Service placing colonies (artificial cavities) on National Forest lands adjacent to private lands.

Alternative E must be revised to exclude translocation of any birds within 3/4 miles of private lands.

(8) Chickasawhay As a Recovery Unit.

Although the Chickasawhay District, which has only 2 colonies, has been designated a recovery population unit, it actually represents poor habitat for the bird. Following are several reasons: (A) According to research conducted by Conner and Rudolph, the optimum age for cavity development in loblolly trees is 80-90 and longleaf is 100-120 years old. (Practical experience show that cavities are excavated in much younger trees). The trees on this unit do not meet these criteria. Since the entire district was planted in 1935-37, there are practically no trees of sufficient age for cavity development presently on the unit nor will there be for



another 20 to 40 years. Roughly 30% of the forest is under 25 years old and the balance is 56-58 years old. The relic trees left when the area was cut over prior to National Forest ownership have either died from old age or been taken out by hurricanes or insect and diseases; (B) Contrary to the belief of Regional RCW experts, the Chickasawhay unit of the Desoto National Forest is not a predominately longleaf forests. Only about 34% of the area is in longleaf pine type while the balance is in loblolly and slash with the preponderance being slash pine; (C) Mid-story hardwoods have been and will continue to be a deterrent to creating suitable habitat on this unit. Past hurricanes, which have opened up the stands, coupled with less prescribed burning have resulted in rapid growth of hardwoods over the last 24 years. Many now occupy positions in the mid-story. The expense of removing these hardwood would be exorbitant and the political fallout from local sportsmen would be hard to overcome; (D) Because the forest is in a hurricane prone area, the sustainability of any population over a long period is unlikely. A review of hurricane occurrences within the RCW range indicates that an event of the magnitude of Hurricane Hugo occurs every 6 years. A review of the history of hurricanes and the damage to forest stands on the Desoto National Forest bears this out. In the last 24 years alone the forest has sustained 3 major hurricanes, two of which inflicted severe damage over the entire forest, while the third was limited to the lower 1/3 of the forest.

Alternative E must be revised to exclude the Chickasawhay as a recovery unit.

#### (9) Historic Range

During plan preparation the team considered 10 alternatives. Five were eliminated from detailed study. One such alternative eliminated was "Recovery efforts that include the birds' historic range." The Tombigbee Forest was listed as historic range and is in close proximity to the Noxubee Wildlife Refuge population. You have outlined a very reasonable and logical justification for not considering this alternative. We remain skeptical, however, that in light of current pressure from the local Audubon group and the U.S. Fish and Wildlife Service the Tombigbee will be targeted for translocation of birds.

We encourage you to refrain from stocking birds on the Tombigbee National Forest.

#### (10) Conversion of Homochitto Loblolly to Longleaf.

Alternative E provides for the use of clear-cutting only for restoration of certain species. We are concerned that this policy could lead to the attempted establishment of pine species to sites for which they are not adapted. Site species relationship studies have been conducted over the entire south and we suggest that the recommendations from these studies be followed in all pine regeneration efforts. Specifically, we strongly oppose any policy

that would advocate the replacement of the excellent stands of Loblolly pine on the Homochitto National Forest with longleaf. As you are aware this forest contains some of the Highest site indices for loblolly pine found on the North American Continent. Conversely, we would be just as strong in supporting the replacement of Loblolly and Slash pine on the Desoto forest with Longleaf.

Alternative E should be changed to read as follows: Longleaf pine will be regenerated only on soils suitable for this specie. On the Homochitto National Forest longleaf may be established only on Lorman Silt loams with slopes 0-20% and on Smithdale soils on 8-20% slopes.

As you know the National Forests in Mississippi as well as those all over the south are very critical to the continued well being of the forest product industry of the region. Here in Mississippi, the National Forests provides as much as 15% of the wood harvested in the state. Of more importance, however, is the quality of raw materials coming from these lands. This volume represents a large percentage of the high grade lumber produced in the state. Our plants have traditionally depended on this volume and the reductions we have seen over the last 3 years are already resulting in severe economic impacts. Any further reductions would be devastating to our industry not to mention the impacts on county governments and local school districts.

We Appreciate the opportunity to comment on the EIS. We Shall be looking forward to working with you to resolve several major problems which now exist with the document.

Sincerely,

*John Behan*

John Behan  
Chairman, Mississippi Federal Timber Council

3-23-90

148

Regional Forester  
U.S. Forest Service  
1720 Peachtree Road  
Room 718 N  
Atlanta Ga. 30367

Box 61  
Cahoon, Miss 32453  
March 17, 1994

Dear Sir,

Here are comments on the proposal to allocate 329,000 acres of three National Forests in Mississippi to extend the range of the Red-Cockaded woodpecker.

Perhaps you are aware that the land was purchased for the growing of timber and incidental stream protection. The Clarke-McNary law allowed the purchase. The Mississippi Legislature passed an Enabling Act to allow purchase which became law on March 6, 1926. President Roosevelt in 1932 supported purchase with funds but his interest was also to provide jobs. The Boards of Supervisors in every county were contacted for approval of lands in their counties.

At present, each county where lands are located receives 25% of all receipts from the sale of timber for schools and roads. In addition money from the sale of timber is reserved for cultural work and for Forest Service roads. The 25% to the counties is in lieu of taxes.

Now on the Bienville N.F. the present prescribed annual yield is 55 mmbf. The estimated yield if your proposal is approved, will be about 16 mmbf. The price of sawtimber is running at \$375 per mbf.

If the reduction takes place, funds to the counties will be greatly reduced. Funds for cultural work and roads will be reduced. Receipts to the U.S. Treasury will be reduced. The loss in jobs will have a greater impact than the loss in funds.

Aside from the money, logging is the primary tool for maintaining the health of the forest and improving wildlife habitat.

In my opinion you are violating the purpose of the purchase of these lands and therefore, the use of the land for the Red-Cockaded Woodpecker as proposed is not a compatible use.

A little bit about compatible uses. In the United States we have 91 million acres of Wildlife Refuges. By the way, this is a million more acres than all the commercial forest acres in the National Forests in the U.S. At present the Wilderness Society has entered a lawsuit against the U.S. Fish and Wildlife Service for allowing motor boats etc. in Refuges because they disturb migratory fowl and therefore is not a compatible use.

I believe you can find other ways to cultivate the woodpeckers without withdrawing 329,000 acres of productive land.

Respectively submitted

Robert W Pearl

Response to Comments in Letter No. 148

From: Robert W. Pearl

Comment No. Response

1. Comment noted. Please see Letter #133, Comment #1.

009 Evergreen Street  
Starkville, MS 39759  
March 21, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Road, NW, Room 718N  
Atlanta, GA 30367-9102

Dear Mr. Dabney:

The US Forest Service is to be commended for the initial steps taken on behalf of RCWs through the DEIS for RCW Management. Clearly, public land offers RCWs their only hope for survival.

Recognizing the urgency and importance of quick and decisive action for RCWs as well as the economics of man-power invested versus the return potential, I support Proposal E with the improvements suggested below which come from hundreds of hours of observations of RCWs at Noxubee National Wildlife Refuge and Bienville National Forest. I am a volunteer who is interested in helping RCWs survive and "recover".

1. The size and age of foraging trees needs to be increased and maintained until RCWs are recovered. To err on the "minimum" size and number of trees will prolong recovery which, in turn, will be more expensive. Larger trees in and near clusters are essential (30, 40, or 50 years old and a much larger diameter than the proposed 12") to enable maximum feeding of nestlings. Adult foraging energy can be conserved as well as offering abundant food for the young. As HMAS overlap in reaching your recovery goals, your tree age and concentration of foraging trees must be more than adequate.
2. Six inserts in newly prepared cluster sites will offer maximum return for the man-power invested. Four inserts could not be adequate (if there are 3 adult RCWs in the clann) when nestlings fledge. It is essential to have cavities available for young fledglings to occupy safely until they have developed the necessary skills for survival. To fledge RCWs to free roost defeats your goal for immediately increasing RCWs. Every cluster site should have a minimum of 6 cavities to allow for larger clan size, cavity competition, and hopefully a place for the new fledglings. At Noxubee, cluster sites with four or less cavities in 1993 were found re-nesting in July with no sign of the banded young from the May nesting. I feel the failures are directly related to lack of safety at night.
3. Snake excluder devices were not addressed in the management plan. I hope they will be mandated in individual forest plans as they are imperative for cavity insert trees. At Noxubee in 1992, SNETS stopped at least 15 snakes from climbing RCW nest trees--this is major predation that cannot be allowed during the recovery period.
4. I was shocked to see nesting season burning allowed under proposal E. I cannot imagine burning being allowed during nesting time because of the disturbance it would cause. Surely, there is time later in the summer when the burn would be more effective and would cause less harm. Bachman's Sparrows will likely be nesting during May and early June--just at the time your burn could be allowed. Surely, this is a species that will benefit from RCW habitat protection--if you don't burn it's nest during May or June.

Response to Comments in Letter No. 149

From: Margaret S. Copeland

Comment No. Response

1. Comment noted. The selected alternative returns to the minimum requirements as established by the USDI Fish and Wildlife Service Blue Book in 1989.  
See also Letter #37, Comment #3.
2. Comment noted. The selected alternative establishes four as the minimum number of usable cavities needed by a group. It also provides priorities for the installation of restrictors and artificial cavities in order to meet this objective. This is intended to be a minimum and based upon site characteristics, population health, cavity competition pressure, budgets, etc., a Forest or Ranger District may elect to provide more.  
See also Letter #37, Comment #.
3. The need to install snake and squirrel excluding devices is recognized in the selected alternative under Reducing Cavity Competition.
4. Comment noted. The use of prescribed fire is critical to creating and maintaining suitable RCW habitat conditions. Due to the fire frequencies needed and the size of the HMAS, burning activities will undoubtedly need to take place throughout the year whenever conditions allow. Some fire during the growing season is believed to be necessary to maintain the health of a fire-maintained ecosystem. Some studies and individual observations have concluded that fire activities within a cluster site did not effect the safety of the young or the feeding activities of the adults. The timing and implementation of prescribed burning will be determined at the local level and will take into account the activity status of a cluster site along with other objectives burn plan.  
While it is recognized that growing season prescribed fire may temporarily remove nesting cover and destroy the existing nests of ground nesting birds in the area, the overall benefits derived from increasing the herbaceous ground layer for future protective cover outweigh the short-term nest losses. In addition to this, there is evidence that the quality brood-rearing habitat provided by these burns may lead to higher young to adult recruitment rates.



Mr. Joseph M. Dabney

Page 2

5. I assume Existing Rights of Way "light maintenance" means cutting the grass one time with a bush-hog mower. Again, planning ahead for maintenance should allow cutting to be done in April and June rather than during the feeding stage of nesting.
6. Cluster site protection from logging activities is not clear. "Limited/restricted depending on time of activity" does not protect the cavity trees from roads, stacking of lumber, noise from machiners, etc. Loggers do not think about protecting tree roots, baby birds, etc. The guidelines need to be specific as to activity and distance from the cavity trees.
7. Your diagram of a cavity insert does not show a slant for the entrance hole to keep rain out. These holes should slant upward and there should be drainage holes in the bottom to allow water to escape. At Noxubee, we have learned that even with slanting entrance holes and placement for protection from prevailing rains water can get in and cause the insert to be abandoned.
8. There is no time-table for recovery. Will there be 2, 5 and 10 year goals? If each forest makes it's own management plan, there would seem to be much duplication of effort. Will there be "guidelines" which all will follow with just some variation according to each forest's situation?
9. I hope desirable midstory trees in clusters can remain. RCWs certainly use hardwoods frequently and a total elimination would invite insects and diseases if there was no diversity. How was dogwood and persimmon chosen as "desirable"? Surely there are other trees that would be desirable, too.
10. Dead snags and dead trees are not mentioned but need to be left for use by other cavity nesters. If other cavities are left close by, the RCW cavities will have less competition.
11. And, most important for my area and work with the RCWs at Noxubee Refuge, I request that the Tombigbee National Forest be included in the plan and managed cooperatively with Noxubee National Wildlife Refuge. I have seen how naturally and easily the RCWs disburse into newly created cluster sites. It is imperative that both these public lands be managed for RCWs cooperatively. With quick cavity insertion and cluster site preparation this summer, RCWs from Noxubee could be in the eastern edge of the Tombigbee within one or two years. With translocation (performed by refuge personnel), RCWs could be placed there this fall. It is important that the US Forest Service recognize their role and responsibility in this endeavor and facilitate the recovery of RCWs in this part of Mississippi.

Thank you for considering these suggestions. I look forward to working with the Tombigbee National Forest personnel in restoring RCWs as well as continuing to work at both Noxubee NWR and Bienville NF. Certainly, I know these birds need all the help and support that we can give:

Sincerely,

*Margaret S. Copeland*

Margaret S. Copeland  
(601-323-1445)

5. The term light maintenance, as used in the selected alternative is meant to be a single pass activity, such as mowing or grading.
6. The selected alternative is fairly specific as to the protection of cavity trees and cluster sites. The boundaries of all cluster sites and recruitment stands must be marked prior to any project which would alter the habitat within 1/4 mile of these areas. Site-specific measures would be taken to protect all RCW cluster sites and recruitment stands during implementation of these projects.
7. Current specifications for the construction of cavity inserts requires a ten degree upward slant to the entrance hole.
8. The FEIS provides tentative HMA's and tentative estimated population goals for each HMA. The time required to meet these goals will vary between HMA's depending on the current RCW population level and health, the current forest conditions relevant to RCW habitat, the ability to implement management activities and practices, and the effectiveness of the prescribed activities in creating and maintaining suitable RCW habitat conditions.
9. The management direction for the RCW that is established by this FEIS is intended to revise the Regional Wildlife Habitat Management Handbook, amend the Southern Regional Guide and eventually become incorporated into affected Forest Plans. Regional direction for the management of the RCW is intended to be programmatic. It is meant to provide and maintain uniformity of implementation regionwide. The selected alternative does allow flexibility in many of the management practices and tools that may be appropriate for a given situation. Additionally, the DEIS recognizes that there may be site-specific situations where this direction may require modification. Modifications to this direction is allowed at the Forest and site level with concurrence of the U.S. Fish and Wildlife Service.
10. The selected alternative does allow for the retention of an average of three selected hardwood midstory trees per acre within clusters and recruitment stands. The exception to this is within 50 feet of a cavity tree, where all midstory hardwoods are required to be removed. The determination of which midstory hardwoods should be retained will be made at the local level and be dependent on individual cluster site conditions and local issues.
11. Please see Letter 147, Comment #9.



Be RCW 150  
3/23/77

-102 Sugar Crossing Ct  
Sugar Land, TX 77478  
20MAR94

Mr. Joe Dabney  
RCW EIS Team Leader  
USDA Forest Service  
1720 Peachtree Rd., NW  
Atlanta, Ga 30367

Dear Mr. Dabney:

I am writing this letter as forestry issues coordinator for the Audubon Council of Texas, a group of almost 20,000 people concerned about environmental issues. The following are comments and concerns about the red cockaded woodpecker (RCW) EIS:

1. No alternative in the EIS is close to the court ordered plan in Texas which has been successful. Fifty new colonies have been reported in the last three years under the court ordered plan. However, the forest service virtually ignores this system. Proposing instead alternatives which much more closely resemble the management system which has brought the RCW to the brink of extinction. Clearly, managing for RCW recovery is not the primary objective of the plan. Instead, the emphasis appears to be on maximizing timber yield while doing the minimum necessary to preserve barely adequate numbers of birds in limited areas of the forest.

No provision is made for expansion of RCW from the HMA 'reservations' allotted to them. Only the HMAs are to be even nominally managed for RCW; the rest of the forest is business as usual. As a result, there is little likelihood that any land not initially allocated to an HMA will ever develop into RCW habitat. The RCW is being restricted for the sake of timber production.

Evaluation of "regeneration" techniques clearly is based on timber criteria. For example, uneven-aged management is rejected due to negative effects on regeneration, despite the fact that the objective is supposed to be RCW recovery.

The plan is generally lacking in quantitative documentation.

2. The ambiguous provisions for monitoring are totally inadequate. Monitoring needs to be done so that population statistics are adequately updated and quickly available to identify needed corrections to the plan before it is too late.

3. No alternative should have rotations shorter than 100 years. There is not even convincing evidence that 100 years should be used as a minimum rotation, since studies so far have basically indicated that the RCW prefers the oldest available trees. RCW may prefer even older trees if they were available. Under no

Response to Comments in Letter No. 150

From: Jane A. Schultz, Audubon Council of Texas

Comment No. Response

1. The court ordered plan for RCW management in the National Forests in Texas received a jeopardy opinion from the USDI-Fish and Wildlife Service. It is the biological opinion of the Fish and Wildlife Service that the above stated plan will not lead to the recovery of the RCW in Texas. Due to the variety of pine species involved and the variability of site characteristics and current forest conditions, the selected alternative allows for a variety of harvest cutting methods in order to achieve the desired RCW habitat conditions. No single management system or set of harvest cutting methods is expected to be appropriate for all HMAs across the region. The extent of a particular silvicultural system and the availability and amount of a particular harvest cutting method will be determined at the forest and site levels based upon the needs of the RCW, local issues and objectives, and other site characteristics.

The tentative HMAs represented in the FEIS were established upon the presence of active RCW clusters as of 1986. The final HMAs will be established by each individual National Forest through the Forest Land and Resource Management Plan process. Land allocations to management areas are also made through this process. Additional areas may be included in a HMA depending on Forest's ability to manage the HMA(s), especially with fire, and the other public issues that must be addressed through the Plan.

Comment noted. The discussion referred to has been rewritten in the FEIS. The long term viability of the RCW is dependent upon a sustained flow of habitat through time, therefore the successful regeneration of pine stands is critical to the recovery of this bird.

2. Monitoring is expected to be an ongoing process. The selected alternative requires both population monitoring and habitat conditions monitoring. The intensity of monitoring outlined in this alternative is expected provide timely information for making any necessary management adjustments.

3. Comment noted. The extended rotations lengths established in the selected alternative are within the ranges of those recommended by the Scientific Summit on the RCW. They are expected to not only provide the necessary heartwood but also increase the incidence of red heart, both of which are crucial to cavity

circumstances should any trees be cut before rotation limit is met. A rotation age of 150 years for loblolly and 200 years for shortleaf and longleaf pines would improve the EIS.

4. Small populations should not be written off in order to concentrate on large populations. The goal should not, as the Forest Service seems inclined, be to provide a few large reservations. The goal should be to manage the forest as a whole for RCW recovery, encouraging small populations to thrive as well as large populations. Small populations should receive as much priority for habitat improvement as large populations.

5. Stands which are understocked or damaged should not be clearcut and replanted. The trees in these stands should be left and supplemental plantings made to increase stocking.

6. Mid story removal away from cavity tree area should not be allowed. A completely open midstory allows for increased predation by hawks. In addition, given the Forest Service's predilection for the removal of hardwood, the resulting predominately pine midstory is conducive to rapid spread of the Southern Pine Beetle (SPB).

7. No alternatives should allow foraging areas with trees under 30 years old. There is no documentation supporting foraging areas with trees less than 30 years old.

8. Even-aged management techniques should be severely limited in all areas. Misguided management of public lands by even-aged techniques have caused the problem in the first place. Uneven-aged management should be only method of "regeneration."

9. While use of artificial methods, such as restrictor plates and cavity inserts, to support RCW populations is acceptable in the near term, these methods should not be used to justify management of RCW habitat for timber. It is not acceptable to use cavity inserts, for example, as a justification for cutting older trees since cavity trees can be artificially created with inserts. Inserts should not be used to replace real cavity trees.

In the long term, the plan should be to generate thriving RCW populations that do not require artificial management tools.

10. Plan does not adequately address control of habitat fragmentation. In fact, it does not really address it at all. Nesting and foraging habitat should be adjacent and future habitat needs to be close to existing habitat. Extensive areas should be managed for habitat such that more than enough habitat is available at any time.

11. Pine restoration is likely to be abused and used as an excuse for excessive cutting and replanting such that the newly "regenerated" area is just another pine plantation. This type of

excavation. These extended rotations, the establishment of recruitment and replacement stands, and protecting some level of residual trees during most regeneration activities are expected to fully meet the needs of the nesting habitat requirements of the RCW.

4. The Forest Service recognizes the need to manage all RCW populations accordingly. Alternatives C, D and E incorporate a risk classification strategy according to risk of extirpation. Management intensity levels have been established in relation to existing population status. Small widely dispersed populations of RCW would be protected and managed more intensively than larger connected populations. The Forest Service would monitor and reassess MFL classifications of all RCW populations annually, based upon how the population has performed the previous five years.

5. Please see Letter #119, Comment #14.

6. Please see Letter #119, Comment #8.

7. Comment noted. The selected alternative returns to the minimum requirements as established by the USDI Fish and Wildlife Service Blue Book in 1989. These minimum requirements stipulate that pine and pine-hardwood stands under 30 years of age are unsuitable for RCW forage.

8. Please see Letter #119, Comment #1.

9. Rotation for regeneration of pine has been extended to encourage natural cavity development by the RCW. It is the goal of the Forest Service to provide a sufficient number of trees for this purpose. The use of artificial cavities is intended to be a short-term measure needed to get RCW populations beyond the limited number of naturally occurring suitable cavity trees. Artificial cavities are costly and require recurring maintenance to maintain their usefulness to the RCW.

10. The designation of a HMA represents a long term commitment to RCW habitat needs at the landscape scale. The management activities and restrictions described in the selected alternative are intended to provide for the immediate needs of existing RCW populations and result in the eventual long term viability of the species. Fragmentation has been adequately addressed harvest restrictions which include extended rotation lengths, high leave basal areas for irregular shelterwoods, retention of relicts and reduced regeneration patch sizes. Additional fragmentation controls have been afforded to those populations at greatest risk of extirpation (MFLs 3 and 4) by prohibiting the regeneration of forests within 1/4 mile of all RCW groups.

11. Comment noted. Throughout much of the RCW's range, longleaf pine forests provided and continue to provide optimal habitat conditions for this species. Given this and the apparent

approach caused the current RCW problem. Potential RCW habitat should not be cut for timber using "restoration" as an excuse.

12. Translocation should not be allowed for timber reasons. Translocation could easily be abused by the forest service such that birds are translocated solely to allow "regeneration" of the area formerly occupied by the birds.

13. Benefits attributed to even-aged management are over simplified, at best. If the forest service had not mismanaged the forest with ill-conceived even-aged management, the RCW wouldn't be in trouble to begin with.

14. The forest service admits that regeneration of mature stands eliminates species from that stand, but argues that they simply get displaced to other areas. The effects are termed "ecologically insignificant". This does not make any sense. The misguided forest management of the USFS has clearly contributed to creation of many threatened and endangered species. The effects are hardly "insignificant." How, one wonders, do plants re-locate during the short time it takes to completely modify the habitat through even-aged timber practices?

15. The southern pine beetle (SPB) EIS should be reevaluated to include the use of pheromones for SPB control. The EIS currently requires cutting as a control measure in many cases where pheromones may be a better approach. Much senseless destruction of forests, including wilderness areas, has resulted in the name of protecting RCW habitat from SPB. Further, the documentation in the EIS is totally inadequate due to insufficient basic data and documentation.

In summary, all alternatives evaluated in the EIS are unsatisfactory as proposed. The EIS would be greatly improved by development of a management plan resembling the court-ordered plan in Texas. The above comments should be incorporated into the EIS.

We request that a copy of the final EIS be sent to the address listed above when it is available.

*Jane A. Schultz*

Jane A. Schultz  
Audubon Council of Texas  
Forestry Issues Coordinator

inter-relationships between rotation lengths, prescribed fire frequencies, soil properties, insects and disease, and overstory species composition, longleaf pine (where it historically occurred) may be the species most compatible with the management strategy in all or portions of some HMAs. The selected alternative encourages the restoration of longleaf pine and other RCW preferred pine species where there is long term benefit to the RCW and no short term adverse effects.

12. Translocations are used to move juvenile birds from relatively healthy populations to augment a single bird group or to create a new breeding pair in previously unoccupied habitat. There is no intention of moving all the birds out of currently occupied habitat.

13. Comment noted.

14. Please see Letter #33, Comment #7.

15. Research is presently inconclusive concerning the use of pheromones to control southern pine beetle infestations; and they are currently unavailable for widespread use.





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Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm. 718N  
Atlanta, GA 30367

FAX (404) 347-4448

Dear Joe,

I am responding to your invitation to comment on the draft EIS of the Red-cockaded Woodpecker management plan. While there is much in the plan to be encouraged about, I was disappointed in some of its most basic aspects.

**Introduction:** At present, no one has a clear idea of exactly what the RCW needs to flourish. As a result, the consensus is that the more closely we can approximate conditions of the original forest, the more likely we are to hit upon the combination that will allow the RCW to thrive. I believe this is why the plan proposes an "ecosystem management approach at the landscape level" and why it claims that "[p]ractices would emphasize restoring the habitat conditions under which the RCW evolved." While this sounds terrific, many of the proposed actions sound more like "forestry-as-usual", the same "forestry-as-usual" that put the ecosystem and the RCW's in the fix that they are presently in. The practices of "forestry-as-usual" cannot and will not safeguard the RCW. *To continue their use amounts to a dereliction of duty under the Endangered Species Act.* Let me elaborate this line of thinking below. To clarify my points, I have adopted a format in which I first outline an action proposed in the USFS plan, then the problems I see with that action, followed by solutions for the problems.

**1. USFS Proposed action:** Shelterwood, seed-tree and irregular shelterwood methods of "regeneration" are all allowed. Seed-tree cuts that leave as few as 5 trees per acre are allowed.

**The problem:** All these methods are actually clearcutting in two steps. Allowing these practices to continue amounts to "forestry-as-usual", not ecosystem-level management. Ecosystem management implies that management practices will mimic natural processes, resulting in an ecosystem that retains its biodiversity and natural functioning. Clearcutting, whether carried out in one step or two, is not

Response to Comments in Letter No. 159

From: Walter R. Tschinkel, Professor, The Florida State University

Comment No.

Response

1. Please see Letter #150, Comment #1.
  2. The use of basal area generally accepted as a measurement of tree density. It is used throughout the FEIS to provide a parameter which most forest managers can use. As individual Forests develop desired future condition statements for these areas, it is expected that additional parameters, attributes and qualities will be identified for monitoring purposes. In addition to basal area requirements all alternatives require the production of a continual supply of potential cavity trees by establishing longer rotations, protecting relict trees in younger stands and perpetuating small remnant stands or patches of old growth for replacement and recruitment stand development.
  3. Again, the use of rotation lengths is a parameter that most forest managers and the general public can relate to. Proper rotation of various pine species would be necessary to provide the best quality habitat for future RCW populations. Rotation would ensure a continual long-term supply of RCW habitat by regulating various tree sizes and age classes.
  - The selected alternative establishes a minimum of 120 years as the rotation for longleaf pine. Based upon site conditions or other issues, this fact does not preclude a Forest from adopting rotation lengths in excess of 120 years.
  - Seed-tree regeneration harvests are only allowed within HWAs with recovered populations or those which have achieved their population objectives.
  4. Prescribed burning is recognized throughout the FEIS as a critical management practice for the creation and maintenance of suitable RCW habitat. The selected alternative establishes a burning frequency of 2-5 years within the HWA. The actual frequency on which prescribed fire is introduced into an area will be dependent on many factors, including smoke management concerns, distance to private lands, budgets and personnel.
  5. Please see Letter #122, Comment #6.
  6. Please see Letter #143, Comment #1.
- Forest plans would be revised or amended to be in accordance with the selected alternative of the FEIS. Public input from all interested parties would be considered.

natural. It results in large patches of forest with very unnatural age structure, a forest very unlike the one in which the RCW evolved. I realize that the healthiest populations of the RCW are on forests that have been managed with clearcutting. However, I think it is dangerous to conclude from this that clearcutting does not harm the RCW. As the stock of "old" trees dwindles, this harm will become apparent.

**The solution:** These options must be eliminated from the plan. They are *not* compatible with "restoring the habitat conditions under which the RCW evolved." These habitat conditions consisted of a forest whose trees were of a great range of ages mixed together on a small spatial scale, and almost certainly biased toward greater representation by older trees. Instead of these "clearcut-in-camouflage" methods, the management plan should *require* the use of uneven-aged management and single-tree selection. Even-aged methods will not restore RCW populations to health.

The USFS bias against uneven-aged management/single-tree selection is apparent throughout the plan. It is also completely unwarranted. Abundant examples of successful and economical uneven-aged management of pine forests are available from the Red Hills of southern Georgia and northern Florida, as well as from southern Alabama. There are no valid excuses any more for failing to adopt this more ecologically sound method. Simply "allowing" single-tree selection and uneven-aged management is not good enough. The USFS is like a supertanker that has to make a turn in less than 10 miles because its going to crash into a reef and create an ecodisaster. The rudder has to be cranked all the way to one side, or it ain't going to end happily.

**II. USFS Plan:** Proposes to manage stand composition and density using "basal area" as a deciding measure.

**The problem:** Use of the concept of "basal area" is incompatible with "ecosystem management". Basal area ignores the importance of age and size classes and estimates only the summed biomass of trees on a site. This is not ecology, it is cellulose production.

**The Solution:** Start planning forest management using more ecological parameters that reflect the status of the forest as a population of individuals of particular sizes and ages, particular rates of mortality, natality, turnover, growth and reproduction. In other words, don't just bandy the buzzwords "ecosystem management" about, do it.

**III. USFS Plan:** Proposes rotations of 70 to 120 years, depending on pine species.

**Problem 1:** The concept of rotation is also not an ecological one, but one derived from a form of forestry where trees are grown to fixed ages in blocks, and then cut



down. This is farming, not forestry. If this plan gave more than lip service to ecology, it would try to model the age structure of the managed forest on the range of age structures of real, natural forests. A forest managed to simulate ecological conditions would not have a "rotation", it would be composed of trees with a certain distribution of ages, from young to ancient. The meaningful descriptor would be the *age-frequency distribution*, not the rotation. It would be possible to calculate an average age for a stand, and an average age, or age-distribution for the harvested trees, but "rotation" would mean nothing because it is an artifact imposed upon the stand.

**The Solution:** Rotation should be retired as forestry concept. Give it back to the farmers. In its place, the USFS should develop an ecologically sound harvest system that is tuned to the rate of growth and the age structure of the forest in such a way that the forest is moved toward a more-or-less stable age structure with an increasing or stable standing biomass *in perpetuity*. In this forest, recruitment would take place in the gaps caused by natural tree mortality or single-tree (or small group) harvest. Natural and man-caused tree-mortality would lead to similar outcomes. The spatial nature of this recruitment should be in small patches on a local scale, as it is naturally.

**Problem 2:** On good sites, longleaf pines don't become suitable cavity trees until they are older than 100 years, and they live for up to 400. The imposition of a 120 year rotation is in direct opposition to the needs of the woodpecker. The forest plan also allows seed-tree cuts that leave only 5 trees per acre (an effective clearcut). If more than 5 relict trees exist on that acre, they can be cut under the proposed plan.

**The Solution:** As above, the concept of a rotation should be returned to the farmers. No relict trees should be cut under any circumstances. The goal of the forest plan must become the growth of a forest with a substantial fraction of trees in the 200 to 400 year age class.

**IV. USFS Plan:** Prescribed burning is "encouraged". The acreage to be burned annually in the preferred alternative is 490,000 acres, out of a total of almost 2 million acres in the HMAs. This suggests that prescribed fire will recur on an average cycle of 4 years.

**The problem:** If there is any single point on which most experts agree, it is that the RCW's well-being depends on the recurrent fire that shaped its ecosystem. We may not know exactly what the nature of this dependence is, but it is almost a given in all discussions of the RCW. The healthiest populations of the RCW are in areas that have been burned with the highest frequency.

**The solution:** Considering the strength of this consensus, it doesn't make sense merely to "encourage" the use of prescribed fire. It should be *required*! All

administrations of forests naturally subject to growing-season burns should be required to convert their programs to such burning regimes at the maximum possible pace, using winter-burns as necessary to make this conversion. The goal should be to burn all appropriate areas on an approximately 2 to 3 year cycle, in keeping with the consensus on natural fire frequency.

**V. USFS Plan:** Future projections of timber volumes over the next 3 decades are 9 to 27% below the 1987-89 levels (before the Interim S & G's). The projected volumes increase over these three decades for most of the alternatives.

**The problem:** This has all the earmarks of "forestry-as-usual". During the baseline years, the USFS operated under the Reagan-Bush guidelines of maximizing cut rates. These cut-rates were far above any conceivable sustainable level. For example, on the Apalachicola National Forest, 20% of the (reasonably) mature forest was cut during this period. Continuation of this cut-rate would have eliminated the oldest age-class completely in 5 years, resulting in a very juvenile forest with few of the characteristics the RCW is believed to need.

The use of these years as baseline, automatically makes it look like future timber harvests will be reduced in deference to the RCW. In reality, projected harvest levels are probably not very different from before the Reagan-Bush decade when they were already too high for the health of the RCW. In addition, the plan also claims that longleaf pine will be managed on a 120 yr rotation rather than the present 80 yr. I realize this is a complex calculation, but extension of the rotation automatically means that harvest levels will drop by something approaching 30%. Combining this effect of increased rotation with the need to reduce harvest levels for sensible RCW management, how could there be only a 13 to 16% reduction in harvest levels at the end of 30 years?

The same criticism applies to all the other estimates of economic factors: employment levels, income, and payments to counties. All are inflated by the use of the unsustainable baseline harvest rates.

**The Solution:** The USFS has a history of overestimating the amount of timber than can be extracted from forests. When goals have been attained, they have often been at the expense of the ecological integrity of the forest, causing species like the RCW to be harmed. Estimates of projected allowed harvests cannot be made in the same old way as before the USFS embraced "ecosystem management". They should be based on what can sustainably be extracted from a forest with the full age-structure, in perpetuity. It is clear that the Forest Service has not made its estimates using such methods.

**VI. USFS Plan:** Management direction will be determined largely through the revision of the individual forest plans of the 11 affected national forests, including input from the public.

The problem: The concern here is a socio-political one. The conservation community which has forced the entire RCW issue, is not well-financed and has little manpower and money to spare. Their efforts to safeguard the RCW would be spread over 11 different, geographically separate forests, and would perhaps be left only to small local groups. Conceivably, plans could be adopted without representation from local conservation groups. Timber interests, on the other hand, are well-financed and well organized, giving their point of view an unfair advantage in these proceedings. Thus, we might expect the scrutiny of the 11 forest plans to be quite variable and potentially biased toward timber interests. This may not be the best way to fulfill the Forest Service's obligation to serve the best interests of the RCW.

The solution: The USFS needs to assure that high-quality input from *ecological* experts, and from the conservation community is incorporated into every plan. It seems likely to me that this will require some sort of *rigorous quality-control* review at higher levels. Because many of the issues are technical/scientific ones, it would be best if the plans were referred to outside review panels consisting of non-forest service experts who would review their scientific soundness and probability of achieving the recovery of the RCW.

**Final remarks:** Overall, I was disappointed in the plan. Rather than fulfilling the promise of "ecosystem management ... at the landscape level", it proposes to address the RCW problem with the same old forestry methods that created the problem in the first place. Our old friend clearcutting is still there, though camouflaged. So is rotation-thinking. Uneven-aged management is shoved aside as impractical. Judging from projected harvest levels, production of forest products is still the primary reason for the existence of the USFS. The incompatibility of RCW safeguarding with high harvest levels is not recognized. We haven't even lost that worst of all practices, mechanical site preparation. Fire is in a more prominent place, but still doesn't receive the priority it should.

When historians make the final tally on why the RCW went extinct, is the Forest Service prepared to let it be said they dropped the ball? That they did too little, too late, that the cumbersome USFS bureaucracy was unable to embrace new ways and new goals? I think this is the choice before the USFS: either serve the present interests and watch the RCW continue to decline, or serve the long-term interests of a vanishing ecosystem and the broader values of a changing society.

Sincerely,



Walter R. Tschinkel  
Professor



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Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
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Atlanta, GA 30367

FAX (404) 347-4448

Dear Joe,

At the last meeting of the Friends of the Apalachicola National Forest, at which you were present, we discussed submitting a communal letter on the subject of the RCW management plan.

Because of the shortness of time and the need to circulate any communal letter before mailing it, we have decided not to do this. Instead, several of our members will submit individual letters to you directly. I have read several of them, and am sure you will find them well-reasoned, insightful and constructive.

As always, we appreciate the opportunity to comment, and we especially appreciated your presence at our last meeting. It was beyond the call of duty.

Sincerely,

Walter R. Tschinkel  
President, Friends of the  
Apalachicola National Forest

March 21, 1994





# Tall Timbers

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## BOARD OF TRUSTEES

Dr. Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Rd. NW  
Room 718N  
Atlanta, Georgia 30367-9102

Dear Joe,

Enclosed are my comments on the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region. Thank you for the opportunity to review it. I think that this EIS will stimulate healthy discussion about the definition and implications of "ecosystem management" for our region, in a way that will improve public land stewardship.

Sincerely,

*[Signature]*

R. Todd Engstrom

Timber Research, Inc.  
a nonprofit organization  
specializing in research  
and management  
education & education

Re RCW 1/24/94

(160)

Response to Comments in Letter No. 160

From: R. Todd Engstrom, Tall Timbers

Comment No. Response

1. Comment noted. The FEIS provides regional direction and is intended to be programmatic. It is meant to maintain uniformity of implementation regionwide. Old growth forests are a national, regional and local issue. Where the management of old growth stands is compatible with maintaining suitable RCW habitat, these patches could be located within the HWAs. The allocation and strategy for managing old growth forests is an issue currently decided upon at the Forest level through the Forest Land and Resource Management Plan process.
2. Chapter 4 of the DEIS list numerous professionals whose input served in preparation of the document. Chapter 7 lists the literature cited. These individuals and publications provide sufficient information that may be used in Forest level implementations.
3. Opportunity for comment was offered to all the public without regard to their expertise with RCW.
4. Alternative E considers RCW clusters in wilderness areas nonessential for recovery. This determination is based on new technology since 1987 and the fact that all recovery populations can meet their recovery objectives without wilderness acres. Each Forest choosing not to manage wilderness RCW groups must obtain formal consultation with the U.S. Fish and Wildlife Service for an incidental take statement.  
It is also recognized that proper, and often intensive, timber management techniques would benefit the RCW in assuring suitable forage and nesting habitat for future generations.
5. Comment noted.
6. Groups may consist of a single bird. Monitoring and population analysis would be conducted throughout each year on each Forest to determine effects and success of translocation efforts.
7. Comment noted. Fire would remain a management tool and an alternative to other silvicultural methods.
8. Table 2-2 figures of the DEIS are estimates to include all management techniques proposed in each alternative. However,

Review of the Draft EIS for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region - December 1993; U.S. Dept. Agric., Forest Service

R. Todd Engstrom  
Tall Timbers Research Station  
22 March 1994

The goal of this EIS is to provide the foundation for implementation of ecosystem management in southeastern National Forests. As stated on page 1, "The proposed new Regional direction would apply an ecosystem management approach at the landscape level, focusing on restoration of the habitat conditions under which the RCW evolved." This would not only be beneficial to the RCW, but many other species of plants and animals would benefit from an ecosystem management approach (pg. 223). Therefore, the approach should be to understand the ecosystem and to develop management actions that mimic natural processes.

#### Ecosystem Management

By necessity this document covers the ecology and management of the RCW in a wide variety of forest conditions. It seems sensible to develop ecosystem management guidelines on local conditions. An oldfield loblolly forest should not necessarily be managed in the same way as a longleaf pine site with undisturbed groundcover. Using this EIS as a springboard to develop ecosystem management brings up the following issues.

(1) On pg. xxxvii it is stated, "The RCW management direction established ... will provide the consistency needed to aid recovery of the species, yet allow Forest Plan and project level decisions to be responsive to local habitat conditions and other considerations. Decisions such as the delineation of the final HMA's, allowable sale quantities, rotation lengths, and the mix of forest regeneration methods used to perpetuate RCW habitat are best made at these [local] levels." What local ecological knowledge will be used to formulate management procedures for a given forest? Perhaps one compartment per forest should be allowed to develop into an old-growth condition ("the habitat conditions under which the RCW evolved") to establish how the forest functioned on its own. This would not be the same as a Wilderness Area in that research would be permitted and the FS would have management flexibility. (See below for discussion of Wilderness Areas.) Fire would be the major management application, because fire does not operate on a landscape level any more.

(2) Ecosystem management will require in-depth knowledge of local ecological conditions. In the past the Forest Service has promoted foresters and ecologists to jobs that take them to other

burning costs are the bulk of these figures. Herbicide application, intensive site preparation and planting would greatly exceed the cost of prescribed burning.

9. Uneven-aged management is allowed in the proposed action alternative, Alternative E, and would remain an option for implementation. The Forest Service recognizes the benefits of uneven-aged management in some forest types.

10. Comment noted.

11. Comment noted. Ecosystem management techniques and applications are further being developed on the National Forests. Prescribed fire method and goals will be expanded upon in individual Forest plans.

areas or to desk jobs as soon as they start to learn about a system. This could be described as maintaining a state of perpetual ignorance about local forest ecology. What can be done to provide adequate opportunity for career advancement while staying at a given location?

(3) The new concepts in this EIS are the HMA and MIL. This is single-species (RCW) management that will benefit other species: the indicator species approach. By extension, MIL1 (a recovered RCW population) will be "ecosystem management." Although the sections on vegetation and biological diversity in Chapter 3 begin to define ecosystems and the basic elements of how they function, this deserves more discussion and public comment to a wider audience than RCW specialists.

#### **Wilderness Areas**

The use of Wilderness Areas to provide a template for ecosystem management is never discussed. Perhaps much of the habitat in Wilderness Areas is not appropriate for RCWs, but it seems extreme to write off RCWs in Wilderness Areas. (pg. 174 and other locations). Recruitment stands "should be located outside the wilderness boundary" to encourage "the RCW population to extend itself away from the wilderness into the HMA where the clusters can be managed for its benefit." This seems like an overreaction to the situation in Texas, where offsite loblollies are extremely susceptible to SPB infestations. If upland pines in Wilderness Areas are properly managed with fire, they have the potential to become high quality RCW habitat. Perhaps more effort should be made to obtain greater management flexibility (eg. the use of fire) in Wilderness Areas through the legislative process. In this EIS it sounds as if the RCW can't exist without intensive timber management, which makes one wonder about the conditions under which the RCW evolved.

#### **Southern Pine Beetle**

"Thinning of forest stands is a key activity in the production of good RCW habitat" in part because it ensures "proper spacing to reduce SPB risk, 20-25 feet or more" (pg. 43, 84-85). My concern is making the forest too uniform. At least in longleaf, SPB is not as serious a problem. Some trees should be allowed to grow close together, because RCWs may not use the healthiest, fastest-growing trees for cavities, because of sap flow and disease resistance.

#### **Translocations**

Pg. 42 "The Forest Service recognizes the importance of artificial cavities and translocation of RCW in recovery of the species, and these activities will be used extensively. However, the Forest Service's long-term goal is the production of suitable

RCW habitat through an ecosystem management approach, in which the species can sustain itself without these practices."

My concerns are: (1) that the effects of translocation on the donor and recipient populations are not being sufficiently monitored and (2) all the emphasis on translocation distracts from practices essential for ecosystem management (eg. prescribed fire). Before young females are removed from a donor population the following should be known: (a) total population size, (b) effective population size, (c) percentage of nest failures, (d) the number of young fledged, (e) the number of females fledged, and (f) the rate of turnover of adult female breeders.

For example, if 10 percent of a population of 500 groups is composed of single males, that leaves 450 groups. If 20 percent of these don't breed in a given year, that leaves 360 groups. If 20 percent of these nests fail, that leaves 288 productive nests. If these nests produce an average of 1.5 young per year at a 50-50 sex ratio that means a production of 216 females per year. Removal of 30 young females would take approximately 14 percent of the recruitment population. If 20 percent of the breeding females disappear per year (90 birds), that leaves about 2 young females (216-30=186) available to fill each vacancy. These are all hypothetical numbers, but this analysis should be done each year for each donor population.

#### **Dominant Tree Restoration**

Clearcutting would be the preferred method to restore longleaf, shortleaf, or other desirable pine species to appropriate sites currently occupied by trees less suitable for the RCW (pgs. 3 and 50). This might be true to restore sites that have become dominated by sand pine (eg. Eglin AFB), but why not use stands with off-site species to provide foraging habitat and fuel for prescribed fire and slowly encourage natural regeneration of the tree species that occurred naturally on the site or thin and plant the desired species where needed? I realize the pressure to restore ecologically appropriate species coincides with pressure to alleviate economic hardship, but ecologically sensitive restoration should be considered where possible.

#### **Economic Evaluation**

Table 2-2 pg. 29 is very misleading. The alternatives for implementing RCW management are estimated to cost between 70 (Alternative B) and 222 million dollars (Alternatives C, D, and E) over the next 20 years. What makes up these costs? Prescribed fire? What would it cost in herbicide application, intensive site preparation, and planting if fire were not used? This is exactly the type of shallow analysis that will be used by some to decry the costs of the Endangered Species Act.



### Uneven-aged Management

Throughout this EIS, uneven-aged management is consistently portrayed in a negative light. Pg. 34 Young pine trees [in an uneven-aged system] can be killed by fire, which is essential for RCW habitat maintenance. Pg. 34 Uneven-aged management is not suitable for desirable pine species restoration. Pg. 34 Gopher tortoises, Bachman's sparrows and painted buntings don't like stand structure uneven-aged management. Pg. 66 Single-tree selection is inappropriate for longleaf silviculture. Pg. 169 The implication that it provides limited foraging habitat. Pg. 182 "Achieving this desirable stand structure may not be practicable in stands managed with an uneven-aged silviculture system." In general uneven-aged management is presented in narrow, misleading, or false ways.

Every criticism of uneven-aged silviculture listed above can be disputed with examples from the Red Hills. The criticism that the structure of an uneven-aged forest would be detrimental to the RCW is not true. This indicates a lack of understanding of the spatial arrangement of regeneration in an uneven-aged system. Natural regeneration in an uneven-aged system is patchy as gaps are created and filled. The characterization of an uneven-aged forest in which young trees grow in close proximity to RCW trees doesn't take scale and patchiness into account. The system that was strongly advocated throughout the EIS (page 166), the irregular shelterwood, seems to create precisely the structural problems that are incorrectly attributed to uneven-aged silviculture.

Uneven-aged management is very flexible and can easily produce excellent foraging habitat and cavity trees for the RCWs in longleaf pine forest. Management of some private quail hunting plantations in the Red Hills region of south Georgia and north Florida provides an example of how uneven-aged silviculture can be used as the foundation for ecosystem management. A recent inventory (Engstrom and Baker 1993. Third RCW Symposium) indicates that the Red Hills population is the sixth largest population anywhere. Single-tree silviculture is the dominant method used in the region.

Uneven-aged management is not a panacea, but it is very successful in some forest types, and provides the types of ecological and economic benefits that would derive from ecosystem management. The advantages of uneven-aged management include:

- (1) continuously standing forest and reduced forest fragmentation,
- (2) natural regeneration,
- (3) fuel generation that is essential for prescribed fire,
- (4) consistent production of wood products,
- (5) high quality timber production, and
- (6) creation of suitable habitat for many species that prefer natural pine forests, including gopher tortoise and Bachman's sparrow.

These factors should make uneven-aged management a viable

silvicultural option, especially in longleaf systems.

#### The Preferred Alternative

There are several issues related to the rotation age in the preferred alternative of 70 to 120 years depending on pine species. First, use of the term rotation assumes that even-aged management will be the standard silvicultural method used. Second, based on preliminary data from the Wade Tract, which is an uneven-aged old-growth forest (80 ha) in south Georgia, the preferred age of cavity trees is in the 150 to 200 year old range--well beyond the age of rotation. Also, the woodpeckers in the Wade Tract prefer to forage on the larger and older trees although younger trees are available. I plan to present these results at the AOU meeting in June.

I also have concerns on the emphasis placed on translocation and the use of irregular shelterwood as the recommended silvicultural method as MIL increases (see above).

#### Summary

I am concerned that this EIS as a model for ecosystem management in southeastern National Forests relies too heavily on even-aged management. The document presents two competing models for how the longleaf pine ecosystem replaced itself. One model suggests that hurricanes leveled huge acreages and that regeneration was essentially in an even-aged condition. The second model views an uneven age structure created by small gap formation as the dominant mode of forest regeneration. An understanding of scale is essential is a discussion of these alternatives. Developing an ecosystem approach to management would benefit from a thorough investigation of these models. Such an investigation is beyond the scope of this review.

This might not be the appropriate document in which to discuss the structural changes in the Forest Service necessary to implement ecosystem management, but these changes desperately need to be addressed somewhere. Especially important are what models the FS will use to define a preferred condition (see page 1 this review) and how the personnel will obtain the experience necessary to develop and perpetuate good management (page 2 this review).

The EIS also fails to emphasize fire enough. If managers don't increase the amount of forest burned to meet prescribed frequencies, all the effort to translocate RCWs will be in vain in the long-run. I've heard too many times that FS fire officers are not meeting their annual prescribed fire goals. This document would be more convincing as the foundation for ecosystem management if it explicitly stated how the FS will meet its prescribed fire goals.

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Parks & Recreation

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
Dr. Philip K. McKnelly, Director



March 15, 1994

USDA Forest Service  
Public Affairs Division  
P.O. Box 2750  
Asheville, NC 28802

Dear Sirs:

The Division of Parks and Recreation has reviewed the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region. We support the goals of the Draft EIS, and we support the Proposed Action (the Preferred Alternative) as outlined in the Draft EIS.

Perhaps the most significant feature of this plan is USFS's proposal "to incorporate a risk classification strategy" into the management of the Red-cockaded Woodpecker (hereafter, RCW) on its national forests, by placing the southern national forests into one of four Management Intensity Levels (MIL), based on size and population trends of the RCW on each of the national forests. This strategy makes good sense. Forests that have populations at extreme risk (MIL 4) will be managed at a more intense level than those with MIL's of 1, 2, or 3.

Croatan National Forest in North Carolina is on the USFS's MIL 4 list. As of 1992, there were 48 active clusters at Croatan, as stated on page 72, which places it in the MIL 4 category (fewer than 50 active clusters). The Division's Natural Heritage Program has been indirectly involved with RCW protection at Croatan through the USFS's inclusion of a number of RCW sites and habitats on the North Carolina Registry of Natural Heritage Areas. The Division is aware that major shifts in RCW clusters have occurred in the last 10 to 15 years at Croatan that may place the population in a precarious situation should a catastrophic event such as a hurricane take place. Peripheral clusters, both in longleaf pine and in loblolly pine, have been abandoned in the last decade, yet the total active clusters have remained nearly the same. The clusters are more compacted into the center of the forest on the most high-quality longleaf pine savannas and flatwoods. Although this clustering might be advantageous to the birds in terms of gene mixing, it could

Response to Comments in Letter No. 161

From: Harry E. LeGrand, Jr., Zoologist, North Carolina Heritage Program

Comment No. Response

1. Comment noted.

2. The selected alternative establishes a 2-5 year prescribed burning frequency within the HMA. It also encourages the restoration of pine species preferred by the RCW to those sites where they historically occurred.

See also letter #159, Comment #4 and Letter #33, Comment #37.

3. Comments noted.

result in a catastrophe. As is well documented, Hurricane Hugo severely damaged the Francis Marion RCW population in South Carolina. Because the RCW clusters at Croatan are situated within 20 miles of the immediate coast, a strong hurricane could severely impact the entire Croatan population. Thus, there is a great need to spread the population more evenly across Croatan by increasing those populations near the periphery.

The proposed actions listed in the DEIS, if carried out to the fullest, should help to establish a larger and more widespread population of RCW at Croatan than is currently present. The proposed actions, among others, call to: "emphasize the use of artificial cavities and the moving of RCW from area to area (translocation) to speed population expansion and eventual recovery of the species"; "emphasize prescribed fire, including growing season burns"; and "encourage restoration of longleaf and other desirable pine species in areas where they occurred historically and would provide better habitat for the RCW". Each of the above three proposed actions is supported by the Division of Parks and Recreation. The artificial cavity projects at Francis Marion and elsewhere, including North Carolina, have been remarkably successful. Prescribed fire, especially in the growing season, is well known to emulate the pre-settlement natural vegetation and natural communities such that a wide range of plants and animals are benefitted by such burnings, not just the RCW. Finally, longleaf pine habitat throughout the pine's range continues to decline at an alarming rate. Fire suppression favors the loblolly pine over the longleaf pine, and the loblolly pine is not as suitable for nesting cavities as is the longleaf pine.

The Division is concerned about the apparent infrequency of prescribed burns at Croatan in the past few years. More prescribed burns at that forest are needed, especially in the growing season. Many areas now in loblolly pine should be converted to longleaf pine, if the soils are suitable for the growth of longleaf; historically, longleaf was believed to have been the dominant pine over most of Croatan National Forest. Artificial cavities, translocation of birds, increased burning, or increased thinning are needed in peripheral areas of the forest in order to re-populate these areas with RCW and make the forest less vulnerable to a catastrophic event.

The DEIS raises the question of whether removal of hardwood understory in RCW areas would negatively impact mast-dependent species such as deer, turkey, and squirrel. Most of these mast-feeding species are more common in habitats other than in the scrub oak (turkey oak, bluejack oak, scrub post oak, etc.) found in association with the longleaf pine, at least in Croatan



USDA Forest Service  
Page Three  
March 15, 1994

National Forest. Game animals such as those listed are better managed in other, more-productive habitats and not in the longleaf pine habitats occupied by RCW. In addition, these RCW habitats historically had an open canopy of pine over lush herbaceous vegetation as a result of frequent natural wildfires. Considerable hardwood understory is thus an unnatural situation in most southern national forests, and the few species that benefit from these scrubby hardwoods are more than offset by the plant and animal species benefitted by their reduction by frequent fire.

The county map of the range of the RCW on page xxvii is misleading and difficult to read. We suggest that a different color scheme of black and pale gray be used on the map. In addition, the "existing" county information is incorrect. There are many more counties of currently active RCW than are shown on this map, at least in North Carolina. The Natural Heritage Program is aware of active colonies, at least in the early 1990's, for the following counties: Bertie, Beaufort, Wayne, Sampson, Pender (many active clusters), Bladen (many active clusters), Robeson, Columbus, and New Hanover. RCW might possibly still occur in Johnston, Duplin, and Wilson counties.

The Division is pleased to have the opportunity to review the DEIS. The Division hopes that the proposed activities enumerated in the plan will become a reality in the next several years, such that the RCW can make a recovery on the southern national forests.

Sincerely,

*Harry E. LeGrand, Jr.*

Harry E. LeGrand, Jr.  
Zoologist, N.C. Natural Heritage Program

# ARKANSAS FORESTRY ASSOCIATION

4105 CROSS STREET, INC. • LITTLE ROCK, AR 72201-3014 • TELEPHONE (501) 374-2441 • FAX (501) 374-6472

ALLEN BEDELL PRESIDENT JOHN MCENTIRE FIRST VICE PRESIDENT  
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LITTLE ROCK

March 23, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
USDA Forest Service  
1720 Peachtree Road, NW  
Room 718N  
Atlanta, GA 30307-9100

Dear Mr. Dabney:

The Arkansas Forestry Association appreciates the opportunity to comment on the Draft Environmental Impact Statement for the Management of the Red-Cockaded Woodpecker and its Habitat on National Forests in the Southern Region. We think that Alternative E may provide a workable framework for recovery of the RCW on Forest Service lands; however, we have several concerns that the agency should address in the final version. We recognize within the Draft EIS a flexibility in application of management techniques and guidelines across the Southern Region. We urge the agency to highlight and increase the flexibility and make it readily apparent to the individual Forests that site-specific decisions on management of RCWs reside at the Forest level and should be addressed in Forest plans.

We submit the following comments, questions, and suggestions for your consideration as you develop the final EIS.

## Ecosystem Management

Ecosystem Management is referred to in the Draft EIS, but is not well defined, nor is the role of Ecosystem Management discussed as it relates to the management and recovery strategy for the RCW. The Final EIS should provide a more complete discussion of Ecosystem Management. Pre-settlement conditions may not necessarily be the only or the best "desired future condition" to recover the RCW and provide forest commodities for human use while maintaining ecosystem health and productivity.

Response to Comments in Letter No. 162

From: Chris Barneycastle, Arkansas Forestry Association

Comment No. Response

1. Comment noted. Through prescribed burning efforts existing habitat conditions would be changed, but biodiversity is expected to be enhanced. Fire associated habitats and species would be restored to previous conditions.
2. Table 2-2 figures of the DEIS are estimates to include all management techniques proposed in each alternative. However, burning costs are the bulk of these figures. Funding availability would be determined on an annual basis.
3. Comment noted. HMA/sub-HMA information may later be obtained upon request once implementation plans for each Forests are developed.  
Population objectives along with historical and current cluster locations, active and inactive, determined HMA delineation for each Forest. Monitoring to evaluate current and future RCW foraging needs will be on-going.
4. Comment noted.
5. Management for the development of recruitment and replacement stands is essential to provide long-term RCW foraging and nesting habitat. Rotation periods have been extended to enable RCW populations to sustain themselves without the use of artificial cavities or translocation. Recent studies have indicated a need to extend pine rotation periods to provide sufficient heartwood diameter at cavity level.  
The use of clearcutting has been limited in all alternatives to conform with the Chief's 1330-1 letter dated June 4, 1992 and with NFMA at 16 U.S.C. 1604 (g) (3) (F) (1). Clearcutting will be used only where it is the optimal regeneration method to achieve a specific management objective, such as restoring pine species desirable to RCW.
7. Irregular shelterwood method would be applied whenever applicable to best serve habitat objectives. Habitat monitoring would be conducted to assess management implementation and further needs. Other silvicultural options are made available.

The Final EIS should more adequately address the effect of the proposed action on biodiversity and other species of wildlife. Most production will be affected significantly in the long term as prescribed burning controls underburn hardwoods. Implementation of an aggressive burning program as proposed will profoundly affect habitat and wildlife through time. Animal communities will change. Whether it is for better or worse is a value judgment, but the agency should recognize in the Final EIS that habitat and wildlife community changes will occur and discuss those changes frankly.

## 2. Feasibility and Costs

The estimated cost of implementation of Alternative E is \$14.2 million per year during the first 10 years. We cannot determine the accuracy of this estimate based upon the limited information in the Draft EIS. If \$14.2 million per year is a low estimate or if future budgets are reduced and additional funds were required to conduct tasks such as prescribed burning for RCW, where would the funds come from? We need some assurances that funds needed for RCW and other threatened or endangered species management will not come out of budgets for activities such as timber, recreation, or range. The Forest Service was unable to fulfill obligations for mid-story control as defined in its 1993 RCW guidelines. Will you have the budgets and the human resources to fulfill the proposed activities outlined in the Draft EIS?

Additionally, we are concerned about the ability of the Forest Service to burn as much as will be needed. Given the limited opportunities to burn because of smoke management guidelines, human resources needed, and Forest Service policy on burning procedures, we doubt that the agency will be able to accomplish mid-story control using prescribed burning. The Final EIS should address in more detail the ability to achieve the prescribed burning goal (490,000 acres) of the RCW program across the South.

## 3. Habitat Management Areas (HMAs)

The Arkansas Forestry Association thinks that FWS will be provided for in excess of their ability for population growth early in the program, especially where populations are currently quite low. We were pleased to see some limited discussion of differential application of MILs in HMAs and sub-HMAs. We request additional discussion of this concept in the Final EIS and emphasis on its application at the Forest level, including a breakdown of HMAs and sub-HMAs by individual Forest. At the least, provide a listing of Forests where this HMA/sub-HMA concept can be applied.

Forests having HMAs with more than one demographic subpopulation should be able to apply an MIL appropriate for each subpopulation, rather than having to manage all subpopulations

8. The DEIS states that in Alternative E, wilderness RCW groups should be managed, not because they are essential to recover or needed to maintain viability, but because of obligations under the Endangered Species Act. If an individual Forest chooses not to manage its wilderness groups, that Forest must go through formal consultation with the U.S. Fish and Wildlife Service.
9. Comment noted.
10. Information may be obtained at Forest level.
11. Private property was considered during tentative HMA delineation with respect to fragmentation and isolation of existing and potential clusters. As established in HMA delineation in Alternative E of the DEIS, private land should neither be automatically excluded or included as suitable RCW habitat.
12. Comment noted.

within an HMA according to the supportability most at risk. This would be an extension of the HMA/Sub-HMA strategy.

As more data on RCW foraging habitat needs are obtained for various forest types or physiographic provinces or individual forests, which appears likely to lead to a reduction in the amount considered to be required by RCWs, what provisions can be made in the program to reduce the size of HMAs required to support the target populations on the Forests?

#### 4 Foraging Habitat

The Forest Service should consult with the U.S. Fish and Wildlife Service about departure from the requirement of 6,350 pine stems per active cluster, at least on a basis of adaptive management trials on Forests where the RCW is not low in abundance. The agency should include in the final EIS a discussion of the need for research on RCW foraging habitat, by forest type, physiographic area, or individual Forest, and the options the findings could lead to for reducing HMA size if RCWs can do better with considerably less than 6,350 pines for foraging. Recent events on the Francis Marion and studies on the Apalachicola indicate this to be the case.

#### 5. Cavity Trees

The proposed plan is excessive in provision of mature trees for cavity excavation. Extended rotations, replacement stands, recruitment stands, 6 potential cavity trees per acre, and 15-20 or 40 BA of pine left in irregular shelterwood stands is too much. Please consult with the U.S. Fish and Wildlife Service about dropping the requirement for replacement and recruitment stands and consider silvicultural options that result in faster heartwood development to meet cavity excavation needs. Silviculture is as important as age or size index in tree growth characteristics.

#### 6. Clearcutting

The decision to severely restrict clearcutting in the proposed program is a political decision. Several studies have demonstrated clearcutting to be compatible with RCW, having little effect on cluster occupancy or productivity. The appropriate use of clearcutting in forest management has been supported by the Society of American Foresters, Southeastern Section of The Wildlife Society, National Wild Turkey Federation, and Southeastern Association of Fish and Wildlife Agencies. The Draft EIS suggests that clearcutting contributes to RCW habitat fragmentation, citing work by Conner and Eudora. However, it fails to address findings of Hooper and Kennedy, Wood and others, and Wigley and Sweeney on the lack of effects of



clearcutting on RCWs and appropriate measures of fragmentation at a cluster scale.

You should re-visit your decision to restrict clearcutting for RCW management and provide more opportunity for its regular use in MIs other than 1. You should further discuss clearcutting, fragmentation, and RCWs to include all perspectives, making sure that readers understand that clearcutting is not necessarily bad for the RCW. Walker has indicated that clearcutting can be used to capably meet foraging and cluster habitat of the RCW.

#### 7. Irregular Shelterwood

The Forest Service has proposed the use of an untested silvicultural system as its regeneration method of choice to recover the RCW especially in HMs with populations at "severe" or "extreme" risk. How can the agency justify the recommendation of a forest management technique that is without a good technical basis? We question your ability to successfully generate southern pines using irregular shelterwood techniques. Upon what basis does the agency think it will be able to provide for future RCW habitat?

The leaving of overwood (25-30, 40 BA in shelterwood cuts will lead to poor regeneration and slow growth of young pines. One private landowner in Arkansas abandoned a similar regeneration method because of a lack of successful regeneration. Removing all but 6 trees per acre will likely lead to heavy mid-story for a significant period of time and may create management problems when shelterwood (or seedtree) cuts are occupied by RCW. The extended rotations recommended in the Draft EIS may be needed if irregular shelterwood were used extensively; however, such rotation lengths would not be necessary if other forms of even-aged management were used. That is, the appropriate silviculture could decrease the time required to grow sufficient heartwood or foraging habitat. Rotation lengths in the Draft EIS are much too conservative. Walker's modeling confirms these ideas.

#### 8 Wilderness

The Draft EIS excludes Wilderness Areas in the proposed program. These areas provide significant opportunities to contribute to recovery of the RCW and should be included. The Final EIS should address the utilization of Wilderness Areas in RCW recovery and offer general guidelines for management of RCWs in Wilderness. Individual Forests should be given the opportunity to integrate Wilderness Areas into their RCW plans. Development of a burning regime that reflects natural burning intervals and fire intensity for these areas should be compatible with Forest Service objectives for ecosystem management.

## 9. Monitoring

Any adaptive trial should be monitored. Given the recommended regeneration system for RCW populations most at risk (irregular shelterwood) and the increased flexibility that we would recommend for RCW recovery on Forest Service lands, we strongly urge an appropriate level of monitoring to assess the economic costs and biological success of the proposed actions. Use survival or monitoring techniques that are statistically sound and defensible before any agencies or outside groups that may want to review the findings. The MFL strategy will significantly impact production of timber for commodity uses; monitoring of RCW populations is fundamental to interpreting timber production with RCW management in a timely fashion.

## 10. Economic/Social Impacts

The information on regional timber volumes and values, jobs, income, and payments to counties are not meaningful to those of use who live and work near National Forests. They do not allow assessment of localized impacts. It is too easy to show "little effect" of the proposed action on a regional scale when local impacts will be quite severe. Please include in the Final EIS more detailed information on timber jobs, and payments on an individual Forest basis. Economic values for the baseline period and future years should be expressed in the same constant dollars.

## 11. Private Lands

RCW management on Forest Service lands has the potential to create management obligations for adjacent landowners. Artificial cavities in pines within one-half mile of private lands can impact private land management if the site is occupied by RCW and there is insufficient trapping habitat on Forest Service lands. As RCW populations grow on Forest Service lands, RCWs may naturally excavate or occupy cavity trees near property lines. These circumstances may require special management of adjacent private lands for the landowner to avoid a "take" of an endangered species.

The Forest Service should not install artificial cavities within one-half mile of private property without landowners permission and without having sufficient foraging habitat present, and the Final EIS should establish policy and procedures for addressing the impact of RCW management on National Forests to adjacent landowners. The Final EIS should discuss the need for individual Forests to consider the impact of their RCW management on adjacent landowners and to establish a dialogue with adjacent landowners when RCWs on Forest Service lands establish clusters within one-half mile of property lines.

Page 2

Summary Comment

The Arkansas Forestry Association is pleased that the Forest Service recognizes the value of forest "management" to recover the FCW and we agree with the philosophy of providing flexibility for individual forests. We think that flexibility should be increased considerably according to our discussions above. Rather than a single "alternative" for implementation, we think that several alternatives (increased flexibility) should be available to the forests. Monitoring activities should be well-defined and appropriate so that assessment of the alternatives is possible. Once an FCW strategy incorporating increased flexibility is approved, local Forest Plans should be revised as soon as possible to take advantage of that flexibility on a site-specific basis while integrating public input at the local level to assure that all interests are addressed.

We look forward to continuing to work with the Forest Service on the recovery of the FCW.

Sincerely,



Chris Barneycastle  
Executive Vice President

cc: Sen. Dale Bumpers  
Sen. David Pryor  
Rep. Ray Thornton  
Rep. Blanche Lambert  
Rep. Jim Hutchinson  
Rep. Jay Dickey  
Kate Curran

5114 Lawn Arbor Dr  
Houston, TX 77066  
21 March 1994

United States Department of Agriculture  
Forest Service  
Mr J. M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Rd. NW  
RM 718N  
Atlanta, GA 30367

Dear Joe:

#### SUMMARY AND CONCLUSIONS

The Draft Environmental Impact Statement is unacceptable because it is based on increasing the population of red-cockaded woodpeckers (RCW) by as much as 6000 per cent (Table S-1 and Table 2-C-2). The plan assumes that providing approximately 2 million acres of potentially suitable habitat will result in the population increases. The facts appear that RCW populations have decreased in the last few years despite improvements in habitat. There is no realistic basis for making these kinds of projections over a period in excess of 20 years. The population objective as stated in Appendix A are arbitrary and assume viability out to 1500 years.

The plan is a good attempt to return forest management to the Forest Service rather than being set by court ordered documents that may do more damage than good in the long run. It provides protection to RCW clusters but that is where it should stop. The revised EIS should do the following:

1. The plan should be for a specified period that can be managed based on current knowledge. It should not attempt to project recovery without sound scientific basis over any extended period.
2. It also needs to accept the conclusion that in some area, RCW will become extinct and should not be managed to build an unreachable population objective.
3. The plan should establish reasonable zones or HMA's that support the existing RCW populations rather than projected growth zones.
4. The plan needs to address the costs to the Forest Service and the Nation of achieving these objectives and implementing any type of recovery program. The economic impact of the plan needs to be placed on a constant dollar basis (Table S-6).
5. The plan should list the specific environmental consequences of mast reduction if a RCW recovery program is

RCWDRAFT.txt  
Page 1 of 3

Response to Comments in Letter No. 163

From: Kenn Fawn

Comment No. Response

1. Based upon current scientific information on RCW demographics, viability and habitat quality and capability, tentative estimated population goals by HMA are presented in the FEIS. The time period in which the RCW is able to fully occupy each HMA and eventually reach the projected goals will be dependent on the health of each individual population, the current forest conditions relevant to RCW habitat suitability, the ability to implement all practices and activities in the selected alternative, and the effectiveness of those activities in creating and maintaining suitable RCW habitat.
2. Comment noted. Natural disasters and other various circumstances may well contribute to the extirpation of RCW in some areas.
3. The tentative HMAs represented in the FEIS were established upon the presence of active clusters as of 1986. The designation of a HMA represents a long term commitment to RCW habitat needs at the landscape scale. The management activities and restrictions described in the selected alternative are intended to provide for the immediate needs of existing RCW populations and result in the eventual long term viability of the species.
4. Comment noted. The table you refer to (S-6) in the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker (RCW) and its Habitat on the National Forests in the Southern Region (DEIS) has been changed. All comparisons in the revised table will be based upon 1994 price levels.
5. Please see Letter #33, Comment #23.
6. Comments noted.



implemented (Summary page 17).

Setting unrealistic and perhaps unattainable population objectives could result in one or more of the following:

1. Court ordered actions to achieve the "objective" that may further restrict timber operations.
2. Expansion of the program to private lands.
3. Additional costly Forest Service programs to humanly develop habitat.
4. Complete loss of National Forests to any use except RCW habitat.
5. Significant reduction of mast dependent species.

#### DISCUSSION

A plan that promotes recovery should be based on current scientific studies that include the projections of weather, human, and other environmental factors over a specified period with a high degree of certainty and reliability. In short it is doubtful that a small (5 to 20 %) population increase of over a 10 year period can be supported by projection of available data. Predicting wildlife growth is highly uncertain. The plan notes the fact that bobwhite quail populations are declining even though habitat management techniques have been known for 50 years (page 219). Other environmental factors such as weather projections are highly unreliable over a multiyear period and are compounded by the impact of carbon dioxide and other "greenhouse" gases (R. C. Balling, "The Heated Debate"). Balling presents data that show 12 inch variations in annual rainfall in the United States over the last 90 years. As I understand, the projections made in the draft were from 1985 which was about 10 years after placing the RCW on the endangered species list. I found no reported data based on later studies that would support recovery in any reasonable period and took into account other environmental variations.

The plan states that there would be a negative economic impact of 30 % (Table S-5). Table S-6 incorrectly shows a positive economic impact to counties since it uses a different dollar value for timber for future sales. Income should be adjusted to a constant dollar base and include the potential timber inflation impact of west coast operations.

The plan needs to show the cost to Forest Service operations to manage and increase the RCW population (to any level). The plan also should project the impact these costs will have on other Forest Service activities. The future cost projections should include scenarios where the Federal budget reduces

funding to the Department of Agriculture by percentages needed to achieve a balanced Federal budget in 10 to 20 years. Presumably, timber sales costs to the Forest Service would not be burdened by the RCW management overhead and costs. Otherwise Federal timber sales would always be below cost to the Government.

Federal programs should not be based on future projections that exceed 1 to 3 years. The ability to manage assets for change has not been demonstrated in the recent past. The super collider and space station are prime examples. The ability to manage National Forest such as Yellowstone demonstrates a lack of knowledge about environmental impacts of policies. The presumption that the RCW populations can be increased by levels of 1000 to 6000 % as a basis for a plan lacks credibility.

The draft plan needs to address specifically the impact on other forest habitat that depend on mast. (For example summary page 17.) Controlled burning used primarily for RCW recovery should clearly predict the reduction in numbers and by species of mast dependent animals in the forests rather than list affected acres. The plan should also state the impact this reduction will have on recreation activities such as bird and animal watching and hunting. There are no costs or projections of Forest Service activities that would (or may have to be) used to control feral hogs and other animals that destroy longleaf pine seedlings.

Please send me a copy of the revised plan for comment.

Yours truly,

*Kenn*  
Kenn Fawn

Response to Comments in Letter No. 164

NOTE: See #19

From: William Schriever

Comment No. Response

1. Comments noted.
2. The selected alternative requires the establishment and management of a HMA for each RCW population on National Forest System lands, regardless of the population size.  
Translocation from support populations could occur on some occasions for such purposes as pairing single male or female groups. The translocating of all RCW from an area within the HMA is not allowed under the selected alternative.  
See also Letter #150, Comment #4.
3. Please see Letter #33, Comment, #45 and Letter #119, Comment #8.
4. Some species of hardwood trees and shrubs may be eliminated or greatly reduced on some upland sites within the HMAs through prescribed burning and other midstory control measures. However, on other sites within the HMA, hardwoods are and will continue to be a component of these stands. The management activities prescribed in the selected alternative does not attempt to eliminate hardwoods from all stands within the HMAs. Pine-hardwood forest types are recognized as suitable RCW habitat throughout its range.
5. A large majority of the threatened, endangered and sensitive species occurring within RCW HMAs are dependent upon the same fire-maintained ecosystems that support(ed) healthy RCW populations. The prescribed fire frequency prescribed in the selected alternative is expected to benefit these species and their habitats.
6. Comment noted. The Forest Service encourages further research be conducted.  
See also Letter #150, Comment #15.
7. Comment noted.
8. Foraging substrate would be made more accessible by removing midstory hardwoods from foraging areas. Foraging habitat improvements may improve reproductive success through increased

See RCW  
5/29/94  
10/1/94

William Schriever  
P.O. Box 840262  
Houston, TX 77284

March 21, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Rd. NW, Rm 718N  
Atlanta, GA 30367

re: Draft EIS for Management of RCW and its Habitat on National Forests in the Southern Region

Dear Mr. Dabney:

Thank you for the opportunity to comment on the Draft EIS for RCW Management. It is clear that the Forest Service (FS) has put a lot of work into this document. I found a lot that I agree with in the document, but my review has also uncovered quite a list of items that I feel could be improved upon or that I object to. I hope you will consider these comments in your final review of the EIS.

#### AREAS OF AGREEMENT

1. I think designation of Habitat Management Areas (HMA) is an excellent concept. I definitely approve of the plan to include 2 million acres in these areas, a 43% increase over the area now included in the 3/4-mile circles.
2. I agree with the concept of Management Intensity Levels (MIL), with maximum attention and care applied to the most at-risk populations. One reservation I have about this approach is that it permits various cutting "control" measures followed by monitoring. Unfortunately, if the monitoring uncovers an adverse affect on RCWs, it's too late to do anything. The removed trees cannot be replaced!
3. I welcome the inclusion of Uneven-Age Single-Tree Selection Management and Uneven-Age Group Selection silvicultural methods. I believe that age diversity throughout the forest will promote forest health and continued RCW habitat. An improvement I request is that the Group Selection cut be reduced from the proposed 1/4- to 2-acre blocks to only 1/4- to 1/2-acre blocks. This will serve to reduce habitat fragmentation.
4. Though I am opposed to even-aged management practices, I am glad to see the FS include a modified shelterwood cut that has two advantages over the standard method--it permits retention of more residual mature trees and it eliminates the usual second cutting stage that would remove these trees a few years later. If even-aged management is going to continue, I favor this method--even outside HMAs--over the conventional shelterwood or seedtree methods.

## MAJOR OBJECTIONS

### 2. De-emphasis of Small RCW Populations

The implication of the Present Condition of RCW (p. 198) and the FS commitment to "sustain viable populations" (p.258) seems to be that "support populations" (fewer than 50 active clusters) are not sustainable, so nothing needs to be done for them. If the objective, as stated by the FS (p. 200), is recovery of the RCW, I don't think that any single bird can be overlooked or taken for granted. Populations at the greatest risk should receive the greatest attention and priority. I do not favor translocation of birds from support populations. Their vacated cavities would further fragment actual RCW habitat areas.

### 3. Timber Production

The EIS contains a definite emphasis on timber production rather than RCW recovery. I object to massive cutting, thinning and mid-story removal throughout the HMAs. In fact, I am opposed to using timber production planning principles in HMAs. "here is no scientific data cited to indicate that RCW foraging habitat needs to be as uniquely thinned and open as its cavity/nesting habitat needs to be.

I also object to the plan to "regenerate" massive portions of the HMAs to provide future habitat. Does that really make a lot of sense? You are saying we need to cut down foraging habitat now so that there will be suitable foraging habitat 40 years from now and nesting habitat 100 years from now? If you cut down those trees now, the RCWs may disappear long before the new areas are ready. I believe preservation of present trees, longer rotation ages and age diversity throughout the forest will provide the long-term habitat requirements of the RCW.

### 4. Elimination of Mixed Pine/Hardwood Forests

The tone of the EIS suggests that hardwoods present a threatening menace to RCWs and only a massive eradication program will preserve the RCW. This is not substantiated by science and serves to weaken the natural forest balance by eliminating natural species diversity. In fact, several researchers have questioned the need to eliminate hardwoods from RCW foraging habitat.

### 5. Even-Aged Management Methods "Ecologically Insignificant"

The FS states that regeneration of mature stands eliminates species from that stand, but they simply get displaced to other areas. The effects are "ecologically insignificant" (p.260). This is outrageous! If even-aged management had no adverse effects, why are there 50 animals and 100 plants listed as PETS and why is the RCW endangered? It has been during the period of FS even-aged management that RCWs have suffered documented drastic declines! (By the way, now do trilliums and other plant PETS relocate?)

forage availability and foraging efficiency. In the selected alternative, all pine and hardwood midstory would be removed within 50 feet of a cavity tree. An average of three per acre of selected hardwoods may be retained through the remainder of the cluster site. Some pine midstory is to be retained to provide for the future regeneration of the cluster site. The presence of dense hardwoods within the cluster site is believed to improve habitat conditions for cavity competitors such as red-bellied woodpeckers, pileated woodpeckers and flying squirrels.

9. The installation of artificial cavities and restrictors will require a greater level of monitoring. If during this monitoring process, problems with design or installation are observed these practices will then require close scrutiny by Forest Service biologists.

10. Current data indicates that many translocations are successful in establishing successfully breeding pairs of RCW.

11. Comment noted. Please see above Comment #4.

12. Please see Letter #150, Comment #11.

13. Open park-like stands with suitable foraging habitat and cavity trees required by RCW can be successfully provided in even-aged stands. Data provided in the FEIS indicates that suitable foraging and nesting habitat may be produced sooner under even-aged management.

14. A variety of silvicultural methods are allowed under the selected alternative to achieve desired future stand conditions.

15. For any tree harvest within the HMAs, the selected alternative requires project level planning to ensure that all foraging requirements are met, that foraging habitat is not fragmented from cluster sites or recruitment stands, and that adjacent cluster sites, recruitment stands or replacement stands are not isolated.

16. The Forest Service recognizes that past timber harvest methods have contributed to the decline of RCW throughout their range. As new research has become available the agency has taken steps to reduce RCW decline.

17. The selected alternative only allows seed-tree harvests to occur in HMAs where the RCW population has been declared recovered or where the population objective has been achieved. Removal of all seed trees under these circumstances is optional.

18. Habitat monitoring as prescribed under the selected alternative is intended to determine the effectiveness of management activities in meeting the desired habitat conditions. If this monitoring indicates a problem, adjustments will be made.



6. 5. Same Old Southern Pine Beetle (SPB) Control Methods

Since the last SPB EIS was published (1986) there have been many new developments that warrant an update. The use of pheromones, especially verbenone, have been demonstrated to be effective--including cases where no trees were cut. (This could be particularly useful when RCW cavity habitat is threatened.)

The use of predator insects has received additional study. This is a common practice in many other areas of agriculture, especially since pesticides have become less effective on intended species and increasingly dangerous to humans. Use of natural SPB predators would be another excellent method to use in RCW habitats.

Scientific studies regarding effectiveness of SPB "controls" do not address whether ANY method is effective during epidemic SPB population levels. The FS should recognize that SPB epidemics are just as uncontrollable as a hurricane, and that massive cutting in wilderness areas (or the general forest) will still not prevent an SPB epidemic from affecting adjacent private land.

For these reasons, I request that the SPB EIS be opened for review in conjunction with the RCW management process.

OTHER COMMENTS/SUGGESTIONS FOR IMPROVEMENT

1. On page 198 you state that Table 1-1 contains RCW population data for the NFs (1992). Though I feel that data needs to be included, I found the table to be a generic chart for MFL levels, NOT actual population data.

2. If shortage of cavity trees has contributed to decline of RCW (p.198), then FS needs to increase rotation cycles/permit old trees to keep growing.

3. Habitat Management Areas for alternatives C-E are sized by population objectives and habitat quality (p.201). HMA's should be larger for larger populations and for poorer habitat quality (criteria not stated).

4. What does mid-story removal in foraging habitat have to do with increased reproductive success (p.202)? Why is pine mid-story OK, but not hardwood mid story (p.202)? (FS says pine mid-story is needed to provide future habitat, but argument against hardwood is that predators could get too close to cavities. Seems pines would permit the same problem!)

5. Installation of cavity restrictors is said to be followed by "additional monitoring" (p.203). If problems occur, modifications will be made followed by "intense monitoring". How is this ensured....public reports of status?

6. FS cites 85 translocations in last five years with no casualties (p.203). Any data on success in stability and mating among moved RCWs?

19. The research you refer to is listed in the Literature Cited section of the FEIS and is available.

20. The long term viability and recovery of the RCW is dependent upon a sustained flow of habitat through time. This will require the regeneration of pine and pine-hardwood stands.

21. A group selection site of 1/4 to 2 acres would in itself contain unsuitable habitat temporarily. Areas cleared for non-timber management purposes are unsuitable and usually permanent but make up a small percentage of HMAs.

22. Prescribed fire may have to be delayed until seedlings reach a height where they are no longer vulnerable to fire. Depending on the forest type, this may become problematic in uneven-aged management where some level of vulnerable seedlings always occur.

23. Please see Comment #6 above.

24. Thinning young even-aged stands is an option that may be considered at the project level.

25. Comment noted. Protection and management of unique plant and animal communities remains a priority under the selected alternative.

26. The invasion of exotic species may affect the habitat conditions of the RCW. The selected alternative allows for a variety of methods (fire, manual, mechanical, chemical) which may be used under certain circumstances to control exotics.

27. RCWs are associated with pine and pine-hardwood habitats that have been maintained and enhanced by periodic fire. In areas where mixed stands occur, some hardwoods would most likely be retained due to site suitability for hardwood.

7. Elimination of hardwoods in entire HHAs (including foraging areas) reduces biodiversity, including habitat for insects RCWs prey on.
8. Cutting down loblollis via clearcut to "restore" longleafs and shortleafs (p.205) does NOT make sense! These trees would not provide suitable habitat for 80-100 years! We need habitat NOW or the birds will be gone!
9. Even if a few "tall forest cover" trees are retained after the clearcut, they will NOT provide foraging NOW--they will be too open for RCWs to forage. (FS even documents this point (p.212)--"removal of all or most trees in a stand" eliminates foraging potential for 20-40 years!
10. If even-aged stands are better suited to optimum RCW cavity habitat (p.206), then how come RCWs thrived hundreds of years until FS started using even-aged management methods?
11. If very long rotations (150-200 years) increase exposure of large stands to wind damage, why not reduce the risk using age diversity throughout?
12. FS claims even-aged management yields "stand-sized areas of potential cavity trees, foraging habitat...scattered over the forest" (p.212). Unfortunately, this does NOT ensure contiguous nesting and foraging habitats needed by RCWs or that future habitat is adjacent to existing colonies.
13. FS assertion that even-age management produces more potential cavity trees that two-age or uneven-age management (p.212) is unsubstantiated! RCWs were doing FINE until even-aged management came along!
14. Elimination of seed trees (p.213) after 3-5 years is ridiculous! We need all the old trees we can keep, both for now and the future.
15. Matching number of retained shelter trees (basal area) to RCW MIL condition sounds like a reasonable approach. Unfortunately, once a cut has been made and an adverse RCW effect noted, the cut cannot be reversed.
16. FS cites Walker 1993 as projecting group selection to provide more widely scattered potential cavity trees than even-age methods (p. 215), but what were the initial conditions? Did Walker assume starting from a clearcut? from present forest conditions? What growth assumptions/algorithms were used in Walker's model? Are they verifiable in Nature? Why did single-tree and group selection results come out identical?
17. FS rejects group selection uneven-aged method due to negative effects on regeneration (p. 216) despite stated objective of RCW recovery (p.200)!
18. How can FS state that (relatively large) clearings for mineral recovery would be too small an area to have adverse RCW effects (p.218) right after stating that 1/4 to 2 acre group selection sites would result in unsuitable RCW habitat reduction (p.216)?

19. FS states that, since prescribed burns are not appropriate for uneven-aged management (due to vulnerability of young pines), "competing hardwoods and shrubs MUST be periodically controlled (usually with herbicides)". This sounds more like maximizing pine production than maintaining sustainable mixed forest.

20. FS willing to test unproven Irregular/Two-Age Shelterwood regeneration method (p.246), so why unwilling to test new SPB methods (verbenone and use of captive-bred natural competitors)?

21. FS states that conversion of even-age stands to uneven-age management needs to start with heavy thinning of well stocked stand (p.252). Why not start conversion with young even-age stands and preserve the old trees presently existing for future RCW habitat?

22. "Multiple-use" objectives should be rated much lower in priority than "restoring and perpetuating unique communities" (p.258). People can ORV or horseback ride ANYwhere, the RCW and PETS have little choice where they live.

23. FS states that "many species now occur in places where they probably did not occur historically (p.259). This certainly includes Chinese Tallow and Japanese Kudzu, invader species not addressed by EIS/management plans.

24. FS states that pine restoration is a critical component of the RCW recovery strategy--namely return of the forest structure to what it used to be (p.283). They say that is all pines! They also contend that will reduce insect/disease problems. I think they are totally backward on that point!

Sincerely,  
*William Schriever*  
William Schriever

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RCW  
3/24/94

March 20, 1994

Ronney L. Broussard  
Sierra Club  
P. O. Box 490  
Pollock, LA 71467

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Rd. NW, Rm 718N  
Atlanta, GA 30367

RE: Draft EIS for the Management of the RCW

Dear Mr. Dabney:

I believe that the new EIS should address the concerns of so-called displaced workers in the timber industry by addressing past history in which many workers changed professions after the massive timber harvests earlier this century. Recycling of forest products would create new jobs lost as a result of lower timber harvests. I believe that decreased timber harvests in our local area will not cause a "major" economic disaster because of the increased values that will be placed on available timber.

It is the position of the Sierra Club at the present time that there should be no clearcutting of forest lands. Select cutting practices and proper management should be instituted. The Sierra Club, Delta Chapter, opposes the clearcutting as part of the EIS for RCW management. The Sierra Club, Delta Chapter, opposes actions that would gather all RCW into one centralized location. Given the alternative, Alternative "E" appears to provide the best protection for RCW, provided exceptions are made as I have indicated.

There is currently a change of National Sierra Club Policy being considered which would ban all commercial logging on Public Lands and I would be interested to know what affect this would have on the RCW. The Sierra Club believes "no species should be allowed to become extinct because of the activities of man if it is within the power of man to prevent it; toward this goal every effort must be made to prevent any population from becoming threatened or endangered in all or any significant part of its range, and to return to optimum population sizes those species that are currently threatened, endangered, or in unnatural decline".

Sincerely,

*Ronney L. Broussard*  
Ronney L. Broussard  
Sierra Club, Delta Chapter  
Chairman, Forests, Public Lands

Response to Comments in Letter No. 165

From: Ronney L. Broussard, Sierra Club, Delta Chapter

Comment No. Response

1. Comment noted. The use of clearcutting as a regeneration harvest method continues to be an issue at the national, regional and local levels. In most cases, the use of the seed-tree or shelterwood harvest methods will ensure the regeneration of the future stand while maintaining some level of RCW habitat capability. While the use of clearcutting is greatly reduced in most of the alternatives described in the FEIS, with the exception of Alternative B, it is still allowed under certain circumstances such as pine restoration and in the regeneration of damaged or understocked stands.
2. The successful regeneration and establishment of pine stands is essential to providing RCW habitat in the long-term. Regeneration methods to maintain and recover RCW habitat would be accomplished most economically through commercial timber sales. Forest regulation of age diversity would be maintained to provide future foraging and nesting habitat.



Rex RCW 3/24/94

166

Perry County Schools

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David Williams  
Joel Powell, Attorney

Received

Dr. James Deputy Superintendent  
Frank Roberts, Psychologist  
Randy Hubbard, Special Education  
Barbara Kelly, Secretary  
Jennifer Young, Purchasing Agent  
Ernie Green, Bookkeeper  
James Bolton, Accounts Payable

March 22, 1994

U.S. Forest Service  
1720 Peachtree Road N.W., Room 718 N.  
Atlanta, Georgia 30367

Dear Sirs:

Recently we received the information handed to us by Chancery Clerk, Dan Ready, that there is a possibility that we would lose part or all of our Federal Forestry Money. If this is the case, we would have to request to the Perry County Board of Supervisors that we add on approximately three to five mills as a direct cost to the taxpayers of Perry County.

It is our opinion that if this happens, it would put a hardship on the taxpayers of Perry County. Certainly we have our priorities and our priority is to educate the children of Perry County.

In essence we are saying that this would impose a great financial hardship on the citizens of Perry County. I urge you to please take this into consideration as decisions are made.

Sincerely,  
Joel Powell  
Superintendent of Education

Response to Comments in Letter No. 166

From: Joel Powell, Perry County Schools, Mississippi

Comment No.

Response

1. Comment noted. The U.S. Forest Service is charged with responsibilities under the Endangered Species Act and very specific responsibilities with regard to the U.S. Fish and Wildlife Service Red-cockaded Woodpecker Recovery Plan. The Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. Two of the areas identified occur on National Forest Land within Mississippi.

Chapter 3 of the FEIS discusses the economic affects of each of the described alternatives on the 72 counties and parishes within the National Forests with RCW. From these 72, it further identified four counties and one parish as being most dependent on National Forest timber for additional analysis. Economic impacts will be incurred in areas dependent on timber-related jobs and income and reliant on payments to the counties. However, the degree of impact will decrease with time as stands currently in the 0-30 age class grow older. The selected alternative also provides opportunities to lessen the short-term impact through pine restoration and use of the sub-HMA strategy. This will allow the forest manager to move towards a balanced age class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat while providing income to rural communities.

Jasper County  
**Board of Supervisors**

Post Office Box 406  
Bay Springs, Mississippi 39422

Joe Blackney  
Wallace Bogan  
Kenneth R. Hann  
James H. Kennedy

John R. Sims  
President  
March 21, 1994

William R. Ruffin  
Attorney  
Doris Holder Thomas  
Clerk

RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road, N.W.  
Room 718N  
Atlanta, GA 30367

RE: Proposed Set-a-Side Area for Red-Cockaded Woodpecker  
Blenville National Forest, Strong River Ranger District

Gentlemen:

Please be advised that I represent the Jasper County, Mississippi Board of Supervisors and it has come to our attention that you are presently contemplating a much longer range of timber harvesting in the Blenville National Forest to provide nesting areas for the Red-Cockaded Woodpecker. We, in Jasper County, have a tremendous amount of Blenville National Forest in our Northwest Corner. As you know, no taxes are paid on this land and this has a tremendous effect on the economic well being of District III and Jasper County, Mississippi. Up to this point compensation has been made to the County through timber sales and for the most part, we have recovered as much or more from timber sales as we would have if taxes had been levied.

If the timber cutting rotation on the National Forest is increased to 70 to 120 years, then our County would be dramatically affected. We receive approximately \$135,000.00 per year from National Forest timber sales, most, if not all, of this being dedicated to roads and bridges. It is our understanding that there are presently no colonies of Red-Cockaded Woodpeckers in Jasper County and we think the proposal of 70,000 acres in the Blenville Ranger District and 55,000 acres in Strong River District is a bit over dramatic for the protection of the woodpecker.

Please keep us posted of any further development in this matter.

With best personal regards,

*William R. Ruffin*  
William R. Ruffin  
Board Attorney

Approved by:

*John R. Sims*  
JOHN R. SIMS, President  
Supervisor, District III

*Wallace Bogan*  
WALLACE BOGAN  
Supervisor, District II

*James H. Kennedy*  
JAMES H. KENNEDY  
Supervisor, District V

*Kenneth R. Ham*  
KENNETH R. HAM, Vice President  
Supervisor, District IV

*Joe Blackney*  
JOE BLAKENEY  
Supervisor, District I

Response to Comments in Letter No. 167

From: Jasper County Board of Supervisors, Mississippi

Comment No. Response

1. Please see Letter #166, Comment #1.



# Tall Timbers

March 22, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Rd. NW, Room 718N  
Atlanta, Georgia 30367-9102

Dear Mr. Dabney:

I am writing to comment on the December 1993 draft of the RCW EIS. This is a most important contribution to conservation and ecological land management in the Southeastern U.S. The principal habitat of the RCW is the longleaf pine (LLP) forest; as you know, this may be one of the most endangered natural communities in the country. There is less than 5% of the original acreage (3.8 million ac) remaining in this forest type. Even more striking is the very small amount of old-growth forest that remains; less than 5,000 ac in small tracts is scattered across the Coastal Plains. These statistics underline the importance of sound ecosystem management for the RCW and the habitat as a whole. They also help explain some of the misconceptions of LLP forest ecology found in the EIS. Few foresters have had the opportunity to view old-growth LLP; most of it had been cut by the turn of this century.

The overall tone of the EIS is positive step forward. However there are numerous inconsistencies in the draft and there is a basic misunderstanding of fundamental ecology of LLP forests. This means that management recommendations based on this faulty information are also flawed. The misinformation found in the section on vegetation (Chapter 3) and its subsequent inappropriate use in the design of management options, exemplifies this problem.

I will limit my remarks to areas related to my fields of professional expertise. I am the Plant Ecologist at Tall Timbers Research Station and am engaged in numerous studies of LLP forests, including tree seedling establishment, groundcover diversity and fire ecology. In addition, I oversee management and research activities on the Wade Tract Preserve, one of the few remaining examples of old-growth LLP and perhaps the only one that has experienced only salvage logging and is also managed with lightning-season fire. My research and management activities in old-growth LLP provide me with a distinctive perspective, one that is useful for evaluating the USFS draft.

Route 1, Box 678  
Tallahassee, FL  
32312-0712

(904) 893-4153  
FAX (904) 668-7781

BOARD OF TRUSTEES

Response to Comments in Letter No. 168

From: Sharon M. Hermann, Tall Timbers, Tallahassee, FL

Comment No.

Response

1. The vegetation section has been rewritten in the FEIS and attempts to reflect your concerns.
2. Comment noted. Due to the variety of pine species involved and the variability of site characteristics and current forest conditions, the selected alternative allows for a variety of harvest cutting methods, including single tree selection, in order to achieve the desired RCW habitat conditions. No single management system or set of harvest cutting methods is expected to be appropriate for all HWAs across the region. The extent of a particular silvicultural system and the availability and amount of a particular harvest cutting method will be determined at the forest and site levels based upon the needs of the RCW, local issues and objectives, and other site characteristics.

Re RCW 3/24/94

168

I was pleased to read that the USFS intended to manage RCW in the context of the LLP forest conditions that the bird evolved, i.e. pre-European settlement conditions. This premise requires that there be an accurate understanding of the ecology of old-growth LLP forests. I contend that, when the EIS section on vegetation is amended to accurately reflect current understanding of old-growth LLP forests, some forestry possibilities that are ecologically unsound will be eliminated and many inconsistencies in the plan can be corrected.

The rewrite of the vegetation section should be done by an ecologist and not a forester. Each profession suffers specific biases and since the goal is to describe pre-settlement conditions, forestry considerations are inappropriate. Later in the draft, forestry must be included, but initially, the habitat must be described ecologically; it is counterproductive to base the description on forestry terminology and viewpoints. Two additional types of information must be included: a) narratives by early explorers and naturalists and b) results of modern ecological research. Surprisingly, both of these kinds of information were omitted from the management draft.

William Bartram (1) in 1791 saw LLP forests before Europeans cleared large expanses. He commented on "...spacious high forests..." with "...the earth covered with grass, interspersed with an infinite variety of herbaceous plants...". Twenty-five years earlier his father John Bartram noted that in Florida, the straight pines grew at distances of 20 to 100 yards apart (2).

Later Schwarz (3) in 1907 wrote about the last old-growth areas of LLP; by that time, much of the old-growth had been cut. In describing old-growth LLP, he commented that "The most important variation is in the density of the stand of trees. ... Ordinarily the stand of trees does not maintain its uniformity over more than a few hundred acres; often it changes abruptly even within fifty acres. ... The dense groves of poles and tall saplings, though of constant occurrence in the virgin longleaf forests, are usually not over half an acre in extent..." Schwarz, a forester, actually quantified the density and size-class range of half a dozens areas in Alabama, Louisiana and Mississippi. Within each one acre plots he counted between 50-170 longleaf trees ranging in size from 2 to 34 in DBH.

Schwarz also noted hurricane and large blow down damage to local forests. His commentary mentions instances of wind damage to LLP forests and suggests that the growth that resulted after a few years was denser but that in sixty years stem diameters had become varied, ranging from 5 to 10 in.

Mention of large blow downs is scattered throughout early narratives. By all accounts, however, they were uncommon and, at times, resulted in a site losing longleaf dominance (see Schwarz description of a 1873 hurricane in Winne Parish, Louisiana). Early explorers seem to substantiate that LLP forests were generally patchy and uneven-sized.



Some readers may not be satisfied with the fragmentary descriptions of pre-settlement LLP forests. We can supplement that knowledge base with sound ecological observations. The natural history of many diagnostic species provide additional insight into the structure and function of pre-settlement LLP forests. Some of these characteristic species include: wiregrass (*Aristida stricta* and *A. beyrichiana*), gopher tortoise (*Gopherus polyphemus*) and of course RCW. In addition, the natural history of LLP itself provides an understanding of habitat structure.

All of the mentioned species are long-lived and require open sunny conditions to flourish and/or reproduce. In addition, none of these species are pioneers. That is, populations do not invade an area, expand in number and then decrease. In fact, on the most intensely studied old-growth tract, only about 1% of the flora is an annual or biennial; the overwhelming majority of almost 400 plant species are perennials (4). These characteristics all point to a community that is relatively consistent across time.

The environmental conditions that enhance reproductive success of important species suggest additional conditions that are characteristic of the habitat. There is very little data on seed dispersal distances of most of the plant species, but for two that we have information (wiregrass and LLP), the distance is only as far as the height of the parent plant (4,5). Moreover, both of these species become established only in open, sunny conditions. These facts, alone, suggest regeneration in a natural setting occurred in a forest that was spatially complex. The forest was one that had scattered reproductive sized adults with appropriate regeneration sites (open areas) relatively close by. This pattern produces a multi-age (-size) class forest.

Longleaf pine forests as patches of varying ages/sizes have been discussed by numerous 20th century (6,7,8); this pattern was quantified by Platt and co-workers in 1988 (9) through work in old-growth LLP. This study demonstrated that under old-growth conditions, juvenile LLP were spatially segregated from adults. On the 200 ac tract, recruitment from all decades for more than 250 years are represented in the tree population.

The spatial pattern of LLP forest described above, explains why single tree selection (or very small group selection) for saw timber and poles, has been promoted as the ecologically appropriate method of forestry for this habitat type. If the timber basis is developed enough, that is sufficient number of trees greater than 90-110+ years old and with the rest of the population covering an inverse J-shaped distribution, timber can be harvested on regular intervals and yet have forest structure and composition remain within the boundaries of natural range of densities and size-classes.

Farrar and colleagues (cited in the EIS) demonstrated a similar outcome using uneven-aged management on Escambia

Experimental Forest; in fact, on that project, stem densities are maintained at the high end of the natural spectrum. Note that rotation time has no meaning in either system. There may be a cutting cycle, but the land is always in a forested state.

There have been attempts to argue that because blow downs happen naturally, clear cutting on a long rotation is a viable management practice for LLP forests. There is no doubt that blow downs did and do occur. They are, however, by all accounts, rare occurrences. So rare, in fact, that there are no species that exhibit adaptations to this condition. Conversely, there are dozens of species documented to display characteristics that are keyed to living in an open, frequently burned forest.

Single-tree selective cutting coupled with prescribed fire has been used in the Red Hills area of South Georgia and North Florida for many decades. The original timber base has not been depleted on lands that are carefully managed. Timber is cut; economic gains are realized; good quail hunting habitat is maintained; RCW populations flourish; and hundreds of other species associated with LLP forests thrive.

The most recent large blow down in LLP forests recently occurred on the Francis Marion National Forest. Hurricane Hugo eliminated most saw timber-sized trees and severely depressed the RCW population. There is currently major restoration activities underway, including efforts to bolster the RCW in the area.

To date the USFS has been hesitant to explore ways to adapt single-tree selection, as practiced on private holdings, for use on public lands. The agency has also been remarkable slow to explore uses of uneven-aged management as defined by Farrar. Both of these should be encouraged in the EIS.

As noted above, there is very little old-growth LLP forest remaining. That means that we no longer have representative areas for the full range of soil types, local climate conditions, etc. supporting examples of old-growth. It is imperative that good condition, older second-growth sites on public land be set aside. The information that they will generate will be highly valuable for fine-tuning management practices in the future.

As I noted at the beginning of my letter, I believe that when the ecological information is incorporated into the RCW EIS, many forestry options originally proposed, must be discarded. Timber harvest and RCW management are not automatically incompatible. However, forestry must listen to lessons revealed through study of the natural history of dominant or key species. LLP forests should not be farmed on a long rotation but rather selectively harvested on a schedule determined by the habitat.

Sincerely,

*Sharon M. Hermann*

Sharon M. Hermann, Ph.D.

# LITERATURE CITED

- (1) Bartram, William. 1791. The Travels of William Bartram. Edited by Mark Van Doren, 1928.
- (2) Bartram, John. Diary of a Journey through the Carolinas, Georgia, and Florida. Edited by Francis Harper, 1942.
- (3) Schwarz, G. Fredrick. 1907. The Longleaf Pine in Virgin Forest. Wiley.
- (4) Hermann, S.M. Unpublished data.
- (5) Boyer, W.D. 1963. Longleaf pine seed dispersal. U.S. For. Ser. Res. Note SO-3. Southern Forest Experiment Station, New Orleans.
- (6) Williams, J.L. 1827. A View of West Florida. Reprinted 1976, Gainesville University Presses.
- (7) Harper, R.M. 1914. Geography and vegetation of North Florida. Fla. Geol. Surv. Annu. Rep. 6:163-467.
- (8) Bryant, R.C. 1909. Some notes on the yellow pine forests of central Alabama. Proc. Soc. Am. For. 4:72-83.
- (9) Platt, W.J. G.W. Evans and S.L. Rathbun. 1988. The population dynamics of a long-lived conifer (Pinus palustris). Amer. Nat. 131:491-525.

169



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement  
Federal Building, Room 534  
Branford, Georgia 31520  
March 23, 1994



Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S.D.A. Forest Service  
1720 Peachtree Rd. NW, Rm. 718N  
Atlanta, GA 30367

Re: Draft EIS on RCW Management  
National Forests in the Southern Region

Dear Mr. Dabney:

We have reviewed your December 10, 1993 letter and Draft Environmental Impact Statement (DEIS) for the Management of the Red-cockaded Woodpecker (RCW) and its Habitat on National Forests in the Southern Region. Because our area of responsibility is in the state of Georgia, our comments on the DEIS will be limited to the only National Forest in Georgia with RCW - the Oconee National Forest (NF). The Oconee NF also includes the Hitchiti Experimental Forest.

The DEIS lists five alternatives for RCW management on the National Forests, with the preferred alternative being Alternative E. Therefore, our comments are limited to this preferred alternative.

This DEIS divides Forest Service lands into Habitat Management Areas (HMA) for managing the RCW. The DEIS lists the Oconee NF as an HMA and its tentative RCW population objective is 176 active clusters. The 1985 RCW Recovery Plan and the 1990 Forest Service "Interim Standards and Guidelines for the Protection and Management of RCW Habitat within 3/4 mile of Colony Sites" list the population objective for Oconee NF as 210 active colonies (clusters), a difference of 34 clusters. This is because the DEIS omits the northern portion of Oconee NF next to Lake Oconee in Greene and Oglethorpe Counties, Georgia. The northern portion of the Oconee NF contains well over 10,000 acres of suitable RCW habitat and should be included in the HMA. This acreage can provide enough habitat for the 34 additional RCW clusters needed to reach recovery objectives.

Alternative E of the DEIS states that sub-HMAs will be used in HMAs with small RCW populations because "it would take decades for a RCW population to grow to fill the available habitat within the HMAs." RCW management of the sub-HMAs would be at the Management Intensity Level (MIL) 3 or 4 (25-40 BA in irregular

Response to Comments in Letter No. 169

From: Philip Laumeyer, USDI Fish and Wildlife Service, Georgia

Comment No. Response

1. Comment noted. The tentative population objective for the Oconee National Forest has been changed to 200 to reflect the population objective stated in the Memorandum of Understanding between the Hitchiti Experimental Forest, the Piedmont National Wildlife Refuge and the Oconee National Forest. The northern portion of the Oconee was not included in the tentative HMA because of its isolation from the rest of the habitat base. Final HMA delineations will be established through the individual Forest Land and Resource Management Plan process.
2. Comment noted. The selected alternative includes the sub-HMA concept. Under this concept, the area within a HMA but beyond the sub-HMA would be given some additional flexibility to create and maintain suitable RCW habitat conditions to provide long term benefits to the population.
3. Comment noted. The 80 year option is only allowed if historical records indicate that the dominant overstory tree at the landscape level was loblolly or shortleaf pine.



shelterwood areas, and 25 acres maximum regeneration size), while areas outside the sub-HMA but within the HMA would be managed at MIL 2 (6 trees per acre in irregular shelterwood areas, and 40 acres maximum regeneration size). Under this plan, the Oconee NF would likely have these sub-HMAs. However, we believe that sub-HMAs should be deleted from the preferred alternative so that all areas within the HMA be managed equally at the MIL 3 or 4 levels. This will have more long term benefits to RCW.

Rotation ages of pine trees in the DEIS will be 120 years for Longleaf and Shortleaf, 100 years for Loblolly and Slash, and 80 years for Loblolly pines in areas with a high probability of southern pine beetle (SPB) outbreaks. We believe that a rotation age of 100 years should be kept for all Loblolly pines in the HMAs, since the intensive thinning outlined in the plan will reduce the chance of SPB outbreaks.

We agree with other aspects of the plan including the use of prescribed burns, thinning, midstory control, artificial cavities, cavity restrictors, translocation of birds, and limiting the use of clearcuts.

We appreciate the opportunity to comment on this DEIS. If you have any questions, please call Robert Brooks at (912) 265-9336.

Sincerely,

*Philip Gaumeyer*  
Philip Gaumeyer  
Field Supervisor

cc: FWS, Jacksonville, FL (Dawn Zattau)  
FWS, RCW Coordinator, Clemson, SC (Ralph Costa)  
FWS, Endangered Species, Atlanta, GA (Dave Flemming)



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement  
Federal Building, Room 514  
Birmingham, Alabama 35201

March 23, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S.D.A. Forest Service  
1720 Peachtree Rd. NW, Rm. 718N  
Atlanta, GA 30367

Re: Draft EIS on RCW Management  
National Forests in the Southern Region

Dear Mr. Dabney:

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3/25/94

See RCW



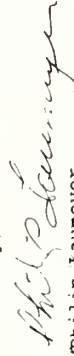
shelterwood areas, and 25 acres maximum regeneration size), while areas outside the sub-HMA but within the HMA would be managed at MIL 2 (6 trees per acre in irregular shelterwood areas, and 40 acres maximum regeneration size). Under this plan, the Oconee NF would likely have these sub-HMAs. However, we believe that sub-HMAs should be deleted from the preferred alternative so that all areas within the HMA be managed equally at the MIL 3 or 4 levels. This will have more long term benefits to RCW.

Rotation ages of pine trees in the DEIS will be 120 years for Longleaf and Shortleaf, 100 years for Loblolly and Slash, and 80 years for Loblolly pines in areas with a high probability of southern pine beetle (SPB) outbreaks. We believe that a rotation age of 100 years should be kept for all Loblolly pines in the HMAs, since the intensive thinning outlined in the plan will reduce the chance of SPB outbreaks.

We agree with other aspects of the plan including the use of prescribed burns, thinning, midstory control, artificial cavities, cavity restrictors, translocation of birds, and limiting the use of clearcuts.

We appreciate the opportunity to comment on this DEIS. If you have any questions, please call Robert Brooks at (912) 265-9336.

Sincerely,



Philip Kaumeyer  
Field Supervisor

cc: Jacksonville, FL (Dawn Zattau)  
FWS, RCW Coordinator, Clemson, SC (Ralph Costa)  
FWS, Endangered Species, Atlanta, GA (Dave Flemming)

Re RCW 3/24/94 (170)

Brink Denney  
502 Cardinal Drive  
Somerset, Kentucky 42501

Joe Dabney  
RCW Team Leader  
U.S.D.A. Forest Service  
1720 Peach Tree Road NW  
Suite 718N  
Atlanta, Georgia 30367

Dear Joe:

I am writing to you concerning the proposal of the United States Forest Service to set aside acreage for the endangered Red Cockaded Woodpecker that has been found to exist in the Daniel Boone National Forest in southern Kentucky. The proposal suggest that 20,000 acres be set aside for 14 birds for their protection and enhancement. This is absurd! This endangered species may need protection but not at the expense of 20,000 acres of federal lands. This would eliminate the potential of timber sales in these areas and also the potential of "private" mineral owners rights to explore and develop minerals within the forest. This results in the loss of potential jobs created by these natural resources.

I would like to suggest in the immediate areas where the Red Cockaded Woodpecker nest are located that timber cutting or development be controlled by the Forest Service in such manner as to allow protection of the nest or species. This could be done by placing a buffer zone around these nest at a distance of 200' ? This would allow for the protection of the species.

I have worked within a natural resource industry and have been associated with an organization which suffered the loss of 200 jobs in southern Kentucky due partially to the protection of the endangered species Black Sided Dace. I am "TOTALLY OPPOSED" to the endangered species act being used by the government agencies as a no development tool at "whatever cost". The Sierra Club (a federal funded organization) mentality is costing thousands of jobs in our nation with most of these being in areas which need natural resource jobs for economic base.

I am "OPPOSED" to your current proposal.

Sincerely,  
*Brink Denney*  
Brink Denney

Response to Comments in Letter No. 170

From: Brink Denney, Somerset, KY

Comment No. Response

1. Comment noted. Tentative HMA delineations setting acreage aside to restoration of RCW management have been based on current and historic RCW group and cluster distribution, habitat suitability and manageability, and current population objectives. The HMA would be large enough to ensure the population objective can be sustained by providing suitable habitat for future RCW populations.

The Forest Service recognizes the economic impacts expected to occur in some areas upon implementation of the proposed alternatives. The degree of impact will decrease with time as stands currently in 0-30 age class mature.



Re: DCI (171)  
3/24/87

March 21, 1984

Re: Draft EIS For the Management of the Red-

wood Forest Service

1720 Pershing Rd. NW, RM 71EN

Atlanta, GA 30367

Re: Draft EIS For the Management of the Red-

wood Forest Service and its Habitat on

National Forests in the Southern Region

The Draft Environmental Impact Statement's proposed action (Alternative E) is a perfect example of why legislation has been introduced in Congress to reauthorize and amend the Endangered Species Act of 1973. Alternative E goes too far in considering biology to the exclusion of other social and economic values. It's also questionable whether the biological decisions concerning the birds has not been based on scientific research.

Also, the sharp reduction in timber harvesting in the Pacific Northwest designed to protect endangered species such as the spotted owl has already caused an artificial supply shortage and increased the cost of lumber for the building industry. Considering the fragile state of the U.S. economy and the fact that historically the South has supplied about a fourth of all lumber consumed in the U.S. markets and now as a result of the situation in the West it is supplying more than a third of U.S. demand, can we afford Alternative E? I believe you should back off selecting an alternative until Congress decides on reauthorization of the Endangered Species Act and provisions for equal consideration of socio-economic values.

cc: Richard H. Baker, US Representative  
John Browne, US Senator  
J. Bennett Johnston, US Senator

Gerald Barnett  
Executive Director  
Pineville, LA 71360

Response to Comments in Letter No. 171

From: Gerald Barnett, Pineville, LA

Comment No.

Response

1. Comment noted. Analysis for DEIS alternatives was based on most current scientific research available. Literature is cited in Chapter 7.

Social and economic impacts are addressed in the DEIS. The Forest Service recognizes the economic impacts expected to occur in some areas upon implementation of the proposed alternatives. The degree of impact will decrease with time as stands currently in 0-30 age class mature.

Rec RCW 3/24/94  
172

March 21, 1994

Tommie L. Rogers  
9003 Potomac Drive  
Chattanooga, TN 37421

Joseph M. Dabney, RCW EIS Team Leader,  
USDA Forest Service  
1720 Peachtree Road, NW  
Room 718N  
Atlanta, GA 30367

Dear Mr. Abney:

re: 2670

I have reviewed the proposed amendment to the draft Red Cockaded Woodpecker (RCW) management plan "Strategy for Management of the RCW, Cherokee National Forest" forwarded to me by letter from Laura Mitchell dated March 4, 1994. That amendment proposes to set aside 1500 acres versus the 16,000 acres originally proposed for RCW management. I wish to express my support for the 1500 acre plan. I strongly agree with that plan on the basis that it would dedicate an amount of forest more appropriate than the 16,000 acres for the management of a single RCW colony. Furthermore, dedicating 1500 acres for RCW management versus 16,000 would be more consistent with the "multiple use" philosophy and allow that larger area to be utilized for other purposes.

I thank you for the opportunity to comment on this proposed RCW management plan.

Sincerely,

Tommie L. Rogers, President  
Chattanooga Chapter -  
Tennessee Ornithological Society

Response to Comments in Letter No. 172

From: Tommie L. Rogers, Tennessee Ornithological Society

Comment No. Response

1. Comment noted. Tentative HMA delineations setting acreage aside to restoration of RCW management have been based on current and historic RCW group and cluster distribution, habitat suitability and manageability, and current population objectives. The HMA would be large enough to ensure the population objective can be sustained by providing suitable habitat for future RCW populations.



AMA Charter 5424

RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm. 718N  
Atlanta, Georgia 30367

Dear Sir,

The Trail Riders of Houston would like to comment on the RCW EIS. There seems to be some discrepancy in the wording of this document.

In Chapter 3 Alternative E page 295 states that routine recreational activities would not be restricted in existing clusters or if RCW's move to an existing trail. Further it states that concentrated ORV use (endurcs) would not be allowed during the nesting season. This would seem to be a restriction. To the best of our knowledge there is no documented proof that ORV use has any negative effect on the nesting habits of the RCW. Please advise if we are incorrect.

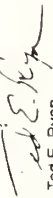
In Chapter 2 Alternative A page 75 states that concentrated equipment use (ORV trails) would be prohibited in clusters, recruitment stands and replacement stands. Chapter 2 Alternative C page 115, Chapter 2 Alternative D page 143 and Chapter 2 Alternative E page 171 all say the same thing as Alternative A.

Chapter 2 Alternative B page 95 is the only Alternative that allows concentrated ORV use with in clusters, recruitment stands or replacement stands. This would be the only Alternative that TRH could support.

In the Summary, page 21 it states that Alternative B would allow the construction of ORV trails through a cluster if done outside the nesting season. The next paragraph states that under Alternative A, C, D, and E if the RCW should relocate near an existing trail the trail would not be affected unless monitoring indicated an adverse effect on the RCW. This seems to be the opposite of what is stated in the EIS. This needs to be corrected. TRH cannot support the EIS the way it is written.

We want you to know why we were not mailed a copy of this document since we had been involved in the process of the RCW EIS. We had not called and requested a copy we would not have been mailed a copy at the final decision making process. Also, several of our members that had made a commitment during the comment period were dropped from the mailing of this document.

Sincerely,

  
Ted E. Ryan  
Legislative Representative

Rec'd  
3/24/94  
(123)

March 21, 1994

Note #5

Response to Comments in Letter No. 173

From: Ted E. Ryan, Trail Riders of Houston

Comment No. Response

1. Concentrated ORV events would not be allowed during nesting season in active clusters. Without specific research it is reasonable to impose temporary restrictions on activities that may have a negative impact on the reproductive success of federally endangered species.
2. These alternatives do place restrictions on such disturbance activities according to season.
3. Alternative B places restrictions on disturbance activities according to RCW population and MIL. In populations with less than 50 active RCW clusters, projects involving motorized or heavy equipment is prohibited during nesting season. In populations of more than 50 active clusters, Alternative B requires such projects be minimized during nesting season.
4. No discussion of ORV trail construction in Alternative B is noted on page 21 of the DEIS Summary. However, Chapter 3 of the DEIS, pages 294-295, addresses recreational disturbance to include response to comment 3 above.
5. We regret that you did not receive a copy of the Draft document without specially requesting it. Having been involved in scoping should have gotten you on the mailing list for it. The process we used was to have eliminated those people who did not respond to the inquiry card.

See RCW 424/14 (180)

115 Bridlewood Dr.  
Brandon, MS. 39042

March 22, 1994

Mr. Joe Dabney  
RCM EIS Team Leader  
1720 Peachtree Rd. N.W. Room 710N  
Atlanta, GA. 30367

Dear Mr. Dabney:

As a concerned citizen I strongly support the management of our Mississippi National Forests for all species while at the same time providing the necessary timber for our country's needs. The Forest Service has done outstanding work providing the necessary tools while juggling various pressures from different Administration's and enacted legislation.

The EIS for the recovery of the Red-Cockaded Woodpecker is too unreasonable in its present form and leaves little room for compromise.

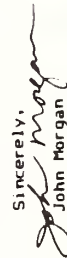
The Forest Service preferred plan, Alternative E, must be modified to allow for rational management of our natural resources.

The following changes need to be made:

1. The populations of birds within the Chickasawhay District is entirely too small for recovery. The Chickasawhay District needs to be excluded and the birds relocated to other areas.
2. Translocation of birds must not be permitted within 3/4 mile of private property.
3. Reduce the numbers for a recovered population, research has shown that 250 breeding pairs are needed to perpetuate the proper genetic variation.
4. Reduce the size of the foraging habitat to only what is needed for the current populations, this would reduce the size of the HMA. The Cherokee population does not need 16,000 acres per cluster while the Davey Crockett is less than 2,000 per cluster.
5. Accurately disclose payments to counties in real dollars, a counties costs escalate much like timber values.
6. Southern forests need to be managed with rotations of 70 years for loblolly and 80 years for longleaf. With the addition of artificial cavities this will more than supply the needed habitat.

I sincerely appreciate the opportunity of responding to the EIS for comment and hope you take these comments into consideration.

Sincerely,

  
John Morgan

Response to Comments in Letter No. 180

From: John Morgan

Comment No. Response

1. See Response #37 et al. Comment #8.
2. See Response #37 et al. Comment #7.
3. The familial relationships used in this FEIS follow those in (Appendix G) the Summary Report from the Scientific Summit on the Red-cockaded Woodpecker, 1990. It was their finding that it takes 500 active groups to have 250 breeding groups, since not all active groups breed.
4. See Response #37 et al. Comment #3.
5. The FEIS has based all economic projections on 1994 dollars.
6. See Response #37 et al. Comment #2.



Received RCW  
3/24/94

(1P2)

14631 Mill Hollow Lane  
Strongsville, OH 44136  
March 22, 1994

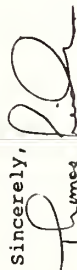
Mr. Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Road, NW, Room 718N  
Atlanta, GA 30367-9102

Dear Mr. Dabney:

Enclosed are my comments regarding the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region. I am submitting these comments as a private individual concerned with the plight of the red-cockaded woodpecker. I currently am a volunteer at the Daniel Boone National Forest in Kentucky where I help with field work and library research projects related to the red-cockaded woodpecker. I was also a participant in the Red-cockaded Woodpecker Symposium III last year.

I hope my comments will be helpful to you in your final decision process.

Sincerely,

  
Thomas M. Leiden

Thomas M. Leiden

Enclosure

Response to Comments in Letter No. 182

From: Thomas M. Leiden

Comment No.	Response
-------------	----------

- |    |   |
|----|---|
| 1. | Comment noted.  |
| 2. | Comment noted. See Letter #33, Response to Comment #34, and Letter #24, Response to Comment #4. |
| 3. | Comment noted.  |
| 4. | Comment noted.  |
| 5. | Comment noted.  |
| 6. | Comment noted.  |
| 7. | Comment noted.  |
| 8. | Comment noted.  |

PART I

COMMENTS AND ANALYSIS AS RELATED TO THE ALTERNATIVES

ALTERNATIVE SELECTION

Recommend that Alternative E be selected as the preferred alternative.

- Ecosystem management is the way to proceed with endangered species. Alternatives C, D and E allow for this type of management via the habitat management area concept.
- Regeneration of the forests is critical to the long term survival of the red-cockaded woodpecker (RCW). Alternative D does not allow for regeneration.
- Rotation ages in Alternative E balances the needs of the RCW and allows ample timber harvest as compared to Alternative C.

TRANSLOCATION

Recommend the immediate translocation of three to five pairs of RCW's be initiated to declining populations of five (5) or fewer active clusters to create an enhanced demographically linked sub-population.

- Several small populations are in severe danger of extirpation in the near future unless immediate action is taken. The national forests listed below, with their 1993 active cluster counts, show at least a 60% decrease from 1992.

Bankhead	0	Jim Huntley (pers. comm.)
Talladega (Northern District)	3	Jim Huntley (pers. comm.)
DeSoto	4	Kris Godwin (pers. comm.)
Daniel Boone	3	

- It appears that for intensive RCW management practices to succeed a minimum number of birds/clusters are required. This minimum number would allow for the natural dispersal of RCW into the new cluster sites prepared, hence, increasing the population (David Richardson, pers. comm., Richardson and Stockie, 1993).

- Is the current system of distributing RCW giving priority to declining populations? The Daniel Boone National Forest has been requesting RCW since the inception of the translocation program and has not received any birds to date. RCW's were cancelled for 1994 season due to lack of birds.

Recommend that programs be established that would allow the exchange or translocation of RCW's from non-recovery populations, if extra birds are available.

- This would allow the interior populations, such as the Daniel Boone National Forest, to obtain birds from similar latitudes and forest types.
- Exchange of birds would increase genetic viability of small populations.

Recommend that information be made available summarizing the successes and/or failure of RCW translocations.

#### FORAGING AND HARDWOODS

Recommend that ten (10) hardwood overstory trees be revised to 20 sq. ft. basal area.

- Daniel Boone National Forest reports extensive foraging on hardwoods during the summer months (Steve Phillips, pers. comm.). This has played an important role in their breeding success as shown below:

Seminary Colony: One breeding pair with two helpers fledged three young.

Vendor Colony: One breeding pair fledged two young.

- Increased competition for cavities due to hardwoods can be offset by increasing the number of artificial cavities.

Recommend that hardwood/pine habitat be reviewed by site to determine its role as suitable habitat

- Based on results in Kentucky (above), may provide suitable foraging habitat during the breeding season.

- Hardwood portion could be thinned to increase pine habitat for wintering foraging.

Keep adequate foraging habitat at 30 years or older (not 25 years).

## PART II

### PROPOSED HABITAT MANAGEMENT AREA

#### DANIEL BOONE NATIONAL FOREST - KENTUCKY

##### SUMMARY

The proposed Habitat Management Area (HMA) for the Daniel Boone National Forest (DBNF) is shown on the enclosed map overlay. The proposed HMA is approximately 3.5 times larger than the tentative HMA. This proposed HMA takes into account all cluster sites, corridors and available foraging habitat for the southern end of the DBNF. Even though several of the sub-populations are inactive, they went inactive in the late 1980's prior to the start of intensive red-cockaded woodpecker (RCW) management. It is recommended that this proposed HMA be adopted returning the RCW to its historic range.

##### HIGHLIGHTS

- HMA population is composed of five (5) sub-populations;
- Acres of pine-pine/hardwood habitat: 71,918;
- Projected population objective: 239 active clusters;
- Current management intensity level: MIL 4
- Recommend implementing a sub-habitat management area strategy.

##### PROCEDURE

##### A) Current and Historic Cluster Sites<sup>1</sup>

- All cluster sites for the three southern districts (London, Somerset, Stearns) are illustrated on the map overlay by the 3/4-mile circle.

<sup>1</sup> Author acknowledges the London Ranger District for supplying data on the cluster sites and pine-pine/hardwood habitat by compartment for the three southern districts.



- Two historic sites in the Stanton District are not included in this analysis due to their distance (>50 miles away).
- Suitable foraging habitat exists. Table I lists the pine-pine/hardwood habitat for the three districts by total acres and by age of pine.
- Boundary of the population is shown on the overlay. Table II lists the compartments of each district included in the population.

#### B) Sub-Population Delineation

- Cluster area segregated into five (5) sub-populations (A to E) as shown on the overlay.
- Table III lists the sub-populations summarizing the number of active and inactive cluster in each. Currently there are only two (2) active sub-populations, both in the London District.
- Table IV lists the acres of pine-pine/hardwood for the sub-populations.
- Table V lists the compartments comprising each sub-population.

#### C) Habitat Management Area Delineation

- Proposed HMA, as shown on the map overlay, is one (1) population comprised of five (5) sub-populations.
  - Sub-populations A, B, C & D are within the 18-mile limit.
  - Sub-population E is just outside the range, went inactive recently, has suitable habitat but not enough to stand alone and is therefore, included in the same population and HMA.
- Recommend the creation of a Sub-habitat Management Area (Sub-HMA) to include sub-populations A, B & C and their respective corridors (boundary to be determined).
  - This sub-HMA will contain approximately 50% of the HMA habitat acreage.
  - All active clusters are included.

- Southern range of HMA is mainly comprised of young pine (<30 years, Table 1), MIL 2 guidelines will ensure future RCW habitat when expansion occurs.

- Recommend that a Memorandum of Understanding be explored with the Big South Fork National River and Recreation Area.

D) Population Objectives

- Projected population objective is 239 active clusters.
- This is based on 71,918 acres of suitable habitat available and using a density of one (1) group per 300 acres.

TABLE I

## DANIEL BOONE NATIONAL FOREST - KENTUCKY

Acres of Pine-Pine/Hardwood in Habitat Management Area\  
(by District)

District	Total Acres of Included Compartments	Percent Pine-Pine/ Hardwood	Acres Pine-Pine/ Hardwood	Acres in Different Age Groups %		
				>80	30-80	<30
LONDON	75,554	29.7	22,417	9,790 43.7%	7,230 32.2%	5,397 24.1%
SOMERSET	58,669	32.0	18,764	4,320 23.0%	5,873 31.3%	8,571 45.7%
STEARNS	89,327	34.4	30,737	6,803 22.1%	10,639 34.6%	13,295 43.2%
TOTAL	223,550	32.1	71,918	20,913 29.1%	23,742 33.0%	27,263 37.9%

TABLE II

DANIEL BOONE NATIONAL FOREST - KENTUCKY  
Compartments Included in Habitat Management Area  
(By District)

London District	Somerset District	Stearns District
4049-4105	5018-5020	6001-6014
4201-4207	5027-5032	6016-6068
4210-4235	5035-5054	6071
	5057-5073	6082-6084
	5075-5086	6087-6092
		6100-6110
		6114-6123
		6126-6135
		6144
		6146-6149
		6162-6164
		6235-6241



TABLE III

DANIEL BOONE NATIONAL FOREST - KENTUCKY  
Status of Cluster in Sub-Populations

Sub-Population	# Active	# Inactive	Year Last Active
A	1	9	---
B	2	4	---
C	0	11	1987
D	0	3	1986
E	0	2	1987

Management Intensity Level: Mil 4

TABLE V

DANIEL BOONE NATIONAL FOREST - KENTUCKY  
 Compartments Included in Sub-Populations

Sub- Population A	Sub- Population B	Sub- Population C	Sub- Population D	Sub- Population E
4049	4215-4228	4092-4093	6023-6025	6127-6128
4054-4064	5068	5029-5032	6030-6035	6130-6133
4068-4090		5039-5042	6037-6045	6148-6149
4095-4102		5045-5052	6051-6052	
4105		5059-5063	6060-6066	
4201-4206		5072-5079		
4210-4211		5084-5086		
		6005-6006		

TABLE IV

DANIEL BOONE NATIONAL FOREST - KENTUCKY  
Acres Pine-Pine/Hardwood in Sub-Populations

Sub-Population	Acres Pine- Pine/Hardwood	Acres in Different Age Groups %		
		>80	30-80	≤30
A	11,206	5,105 46%	3,841 34%	2,260 20%
B	6,141	2,423 40%	1,872 30%	1,846 30%
C	11,856	3,023 26%	3,445 29%	5,388 45%
D	10,435	2,565 25%	3,104 30%	4,766 45%
E	1,858	122 7%	1,098 59%	638 34%
TOTAL	41,496	13,238 32%	13,360 32%	14,898 36%

Bar A. C. W.  
3/2 5/94

MOUNTAIN CITY LUMBER COMPANY

P. O. Box 205  
LAUREL BLOOMERY, TN 37680  
(615) 727-5113

March 21, 1994

Mr. Joseph M Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Rd. NW Rm 718N  
Atlanta, Ga. 30367-9102

Dear Mr. Dabney;

I would like to take this opportunity to respond to the Draft Environmental Impact Statement (DEIS) for Management of the Red-Cockaded Woodpecker and its habitat on the National Forests of the Southern Region. There are several points in the DEIS that we feel must be addressed in order to provide the best possibility for recovery of the Red-Cockaded Woodpecker.

First, we feel Alternative E (the proposed action) requires some modifications in order to respond to the need for site specific flexibility. Rather than having a "blanket prescription" for the forests, there should be enough flexibility in the DEIS to manage for the RCW on a forest by forest level.

Second, the issue of limiting clearcutting RCW populated areas must be addressed. The decision to limit clearcutting seems to be based on politics rather than biology. The need to maintain clearcutting has been supported by organizations including the Southeastern Section of The Wildlife Society, The Turkey Federation, and the Society of American Foresters. Clearcutting is sound forest management which allows regeneration to occur and will assure that our forests will continue to be productive.

Finally, I would like to comment on the issue of longleaf pine restoration. The DEIS fails to recognize the RCW's ability to use loblolly pine as a cavity tree. The loblolly pine also grows heartwood much quicker than the longleaf pine. It appears as if the longleaf restoration is an attempt to reach "pre-settlement" conditions as opposed to the RCW's biological needs. Rather than mandating longleaf pine restoration, the DEIS should allow for more site to site flexibility with both longleaf and loblolly pine.

We appreciate your time in allowing us to comment on the RCW DEIS. If we can be of any help, please feel free to contact us.

Thank you,

*Doug Edwards*

Doug Edwards, Forester

Response to Comments in Letter No. 183

From: Mountain City Lumber Company

Comment No. Response

1. There is flexibility built into the proposed alternative as a RCW population moves toward MIL 1, primarily in the silvicultural practices that can be implemented. The intent of the proposed alternative is to recover the RCW rangewide, and as this strategy is implemented, RCW populations should begin to increase, allowing the forest to move into a less restrictive MIL. There is also flexibility for management built into the rotation age for the various species of pine, including a high risk option for loblolly pine.
2. The USDA Forest Services recognizes that clearcutting is an effective tool to regenerate loblolly, shortleaf, longleaf, slash, and virginia pine in even-aged stands. The use of clearcutting has been limited in the proposed alternative to conform with the Chief's 1330-1 letter dated June 4, 1992 and with NFMA at 16 U.S.C. 1604 (g) (3) (F) (1). Clearcutting can be used where it is the optimal regeneration method to achieve a specific management objective in any HMA or MIL. Clearcutting is allowed in all MIL's to regenerate virginia and pitch pine, to regenerate understocked or damaged stands, and to regenerate stands being restored to longleaf or other pine species desirable to RCW.
3. The proposed alternative recognizes that loblolly pine is essential to the RCW on many National Forests. The DEIS does not mandate longleaf restoration, but emphasizes restoration of fire-adapted communities. The USDA Forest Service also recognizes that restoration of these communities, with the associated pine species, will be limited due to personnel and funding constraints. Restoration will be a long term process, and loblolly pine will continue to be an integral part of the overall recovery process for the RCW, as it does provide suitable nesting and foraging habitat.



Re RCW 184  
3/20/84

163 Bernis Hill Road  
Soso, Mississippi 39480  
March 23, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road NW  
Room 718N  
Atlanta, Georgia 30367

Dear Mr. Dabney

As a citizen of Mississippi I am very concerned by the Forest Service proposal for the management of the national forest in Mississippi. Although I support your effort in protecting the endangered species like the Red Cockaded Woodpecker, I do not agree with the large number of acres being set aside for a single specie. Are we not going for overkill with your plan?

Would not one recovery population on the Bienville Forest of approximately 300 colonies be acceptable? We could then manage the Chickasawhay District for timber production. Also, the proposed rotation lengths are too long. Do you realize that with the rotations you are proposing, the Forest Service will be growing trees with a diameter too large for most mills to utilize?

I also feel that the numbers you are using to show future harvest volumes are too high. Do you really know what the harvest level will be before completing the new Forest Management Plan?

As a forest landowner with land adjoining a national forest I am very concerned with how this plan will affect my tree farm. After several lengthy conversations with my local county officials I am certain that I will pay more taxes if your plan is adopted. Should the landowners of Mississippi bear all the expenses of recovering the RCW?

Thank you for the opportunity to express my thoughts and opinion on this subject

Sincerely yours,

Tommy C. Miller

Response to Comments in Letter No. 184

From: Tommy C. Miller

Comment No. Response

1. Please see comment letter 37.
2. Potential harvest volumes are regional estimates and are based only on RCW constraints. Appendix F provides potential volumes by forest based on regional averages. This data is presented only for relative comparison among alternatives. You are correct that more accurate volume estimates will be developed during forest plan amendments or revisions.
3. Comment noted.

Rec Rcn 185 325/74

# SMITH COUNTY BOARD OF SUPERVISORS

JOHN HESTER  
DISTRICT 1  
BENJIE FORD  
PRESIDENT  
DISTRICT 2  
BILLY GUNTER  
DISTRICT 3  
HOWARDEATON  
BOARD ATTORNEY

P. O. Box 160  
Raleigh, Mississippi 39153  
(601)-782-4000 FAX (601) 782-4002

WILSON HALLMAN  
DISTRICT 4  
JOE H. TALLY  
VICE PRESIDENT  
DISTRICT 5  
DENNIS ROBINSON  
PURCHASE AGENT  
GARY CRUMPTON  
CHANCERY CLERK

March 23, 1994

U. S. Forest Service  
1720 Peachtree Road, N.W.  
Room 719, North  
Atlanta, Georgia 30367

Gentlemen:

Your issued draft environmental impact statement for the management of the Red-Cocaded Woodpecker would have a tremendous impact on our area, since it involves the Bienville National forest lands located in Smith County, Mississippi.

Please accept the attached Resolution executed by the Board of Supervisor of Smith County, stating their opposition of the set aside forestry land for the management of the Red-Cockaded Woodpecker.

We appreciate the opportunity to have some input in this major issue.

Sincerely,



Dennis Robinson  
Director  
Office of the Board of Supervisors

Response to Comments in Letter No. 185  
From: Dennis Robinson, Smith County Board of Supervisors

Comment No. Response

- 1. Comment noted.

**RESOLUTION IN OPPOSITION TO ENVIRONMENTAL  
SET ASIDE OF BIENVILLE NATIONAL FOREST FOR  
THE MANAGEMENT OF THE RED-COCKADED WOODPECKER**

WHEREAS, the United States Forestry Service now manages the Bienville National Forest for the United States of America by and through the United States Department of Agriculture; and

WHEREAS, the Bienville National Forest has been managed to provide for the benefit of the citizens and for the protection of wildlife;

WHEREAS, in a recent United States Forest Service Draft Environmental Impact Statement for the management of the Red-Cockaded Woodpecker and its habitat on the Bienville National Forest in the South, certain areas are proposed to be set aside for breeding areas for the Red-Cockaded Woodpecker; and

WHEREAS, approximately 55,000 acres of the proposed setaside habitat for the Red-Cockaded Woodpecker is proposed to be in the Bienville National Forest; and

WHEREAS, the North 1/3 of Smith County, Mississippi is a part of the Bienville National Forest; and

WHEREAS, Smith County, Mississippi has over the past 50 years worked closely with the United States Forest Service in the maintenance of the roads and bridges in the Bienville National Forest; and

WHEREAS, over the past 30 years there have been numerous contracts between the United States Forestry Service and Smith County, Mississippi in law enforcement, road maintenance, bridge maintenance and other economic areas; and

WHEREAS, Smith County, Mississippi has provided access roads for the management and removal of timber; and

WHEREAS, there are approximately 85 miles of roads in the Bienville National Forest currently maintained by Smith County, Mississippi for the benefit of the Bienville National Forest and the traveling public; and

WHEREAS, a significant amount of the monies spent for the maintenance of roads, law enforcement, and other economic expenditures by Smith County has been from the returns of timber sold on the Bienville National Forest; and

WHEREAS, should the timber harvest be reduced from its current cutting levels to the proposed levels in that event Smith County, Mississippi will be unable to continue the level of maintenance of roads and bridges in the northern 1/3 of Smith County; and

WHEREAS, it is believed that the forestry lands can be maintained in such a manner as to protect the Red-Cockaded Woodpecker and cutting levels that will not totally disrupt the economics of Smith County, Mississippi; and

WHEREAS, Smith County, Mississippi currently uses funds from the cutting of the U. S. Forestry Service maintained land in the Bienville National Forest for the education and maintenance of roads and bridges of Smith County, Mississippi; and

WHEREAS, Smith County, Mississippi is a rural county of approximately 15,000 people; and

WHEREAS, a 2/3 reduction in income from the sale of timber from the forestry lands would decimate the financial conditions



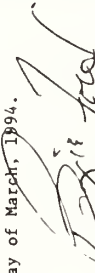
of the schools and roads and bridges;

BE IT THEREFORE RESOLVED that the Board of Supervisors of Smith County, Mississippi does hereby request that the forestry lands in the Bienville National Forest be maintained to protect both the Red-Cockaded Woodpecker and the cutting and removal of timber in such manner that will not pose an economic disaster to the finances of Smith County, Mississippi;

BE IT FURTHER RESOLVED that a copy of this Resolution be forwarded to the United States Forestry Service for its consideration.

SO RESOLVED this the 28th day of February, 1994.

WITNESS MY SIGNATURE, this the 23rd day of March, 1994.



BENJITE FORD, PRESIDENT, SMITH COUNTY  
BOARD OF SUPERVISORS

ATTEST:

  
C. GARY CROMPTON, CLERK



Georgia Pacific Corporation

East Central Regional Office  
Bldg B Suite 104  
1080 River Oaks  
Jackson, Mississippi 39208  
Telephone (601) 932-5308

*See RCW 3/20/79*  
**198**

March 23, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
1720 Peachtree Road NW  
Room 718N  
Atlanta, GA 30387

Dear Mr. Dabney,

Thank you for the opportunity to review the Environmental Impact Statement (EIS) on red-cockaded woodpecker (RCW) management on the southern National Forests. We are aware that the Forest Service has expended an enormous amount of time and effort in attempting to meet its obligations to the Endangered Species Act and to respond to popular beliefs as to how the National Forests should be managed. We live in what is perhaps the toughest period in the history of American natural resources management.

We are aware that you have already received many technical critiques of this document, and it is doubtful that we can add much to those specific comments. Our comments will be more general and of a somewhat more philosophical nature.

While the Forest Service undoubtedly has worked strenuously on this document, we are confused by several points. First, as this is a "no-decision" document, what is its level of importance? Will this document, in fact, be a guideline for operational modes or will the selected option be the template for operations? It is Georgia-Pacific's opinion that the template mode in public natural resources management is an unwise choice because even when problems with the mechanism become obvious, the template is too difficult for a public agency to change with efficiency and effectiveness.

Our second concern is for the proposal to move essentially all of the southern national forests into a single-tree selection management scheme. We agree that an all-aged forest strategy should be a mandate, but we do not agree that the entire forest should be managed with the objective of having all ages in every stand. We are further confused by the implication that a major increase in amounts of summer burning and single-tree selection cutting will result in a sustainably productive forest. Frankly, our sense is that this strategy has the potential to change productive timber areas to savannas or pine barrens. The creation of some of these communities may be desirable as an enhancement of biodiversity, but the crucial question that remains unanswered concerns desirability scale.

Our third concern is for the proposal to replace even-aged management with the "irregular shelterwood" silvicultural system. Our interpretation of the rationale for this proposal for RCW habitat management is that: a) it will create an enormous ratio of potential cavity tree availability to actual need, even at RCW population saturation levels, and b) it is a pre-emptive step in moving from even-aged to single-tree selection management. We suspect that the first reason for using the timber resources with an extravagance far above the habitat needs of the RCW, even in a recovery operation. Furthermore, in our experience, while you can regenerate a stand of seedlings under 30 ft<sup>2</sup> BA/ac of shelterwood, you cannot grow a timber stand under these

Response to Comments in Letter No. 186

From: Wayne Tucker, Georgia-Pacific Corporation

Comment No. Response

1. The management direction for the RCW that is to be established by this FEIS is intended to revise the Regional Wildlife Habitat Management Handbook, amend the Southern Regional Guide and eventually become incorporated into affected Forest Plans. Regional direction for the management of the RCW is intended to be programmatic. It is meant to provide and maintain uniformity of implementation regionwide. The preferred alternative does allow flexibility in many of the management practices and tools that may be appropriate for a given situation. Additionally, the DEIS recognizes that there may be site-specific situations where this direction may require modification. Modifications to this direction is allowed at the Forest and site level with concurrence of the U.S. Fish and Wildlife Service.
2. Comment noted. The selected alternative of the FEIS allows for both even-age and uneven-age management to occur within a Red-cockaded Woodpecker (RCW) Habitat Management Area (HMA). Depending on the Management Intensity Level and the desired future condition of a particular HMA, a variety of regeneration harvest cutting methods are also available. The extent of a particular silvicultural system and the availability and amount of a particular harvest cutting method will be determined at the Forest and site levels based upon the needs of the RCW, the local issues and objectives, and other site characteristics.
3. Comment noted. The FEIS recognizes that irregular shelterwood is an untested regeneration method for loblolly, shortleaf and slash pine. It also states that it is uncertain whether or not this method will supply a steady flow of RCW habitat. Depending on the site, very high densities of seedlings may occur under this silvicultural method. Various techniques are available for reducing these high densities; but in some cases they may not achieve the desired levels or may be cost prohibitive. This like all other activities prescribed in the final RCW management direction will have to be monitored to determine their efficacy towards producing the desired vegetation results.
4. Comment noted. In nearly every instance, the tentative HMAs currently described in the FEIS do not occupy the entire national forest on which they are placed. The FEIS recognizes that forests within the HMAs will require some level of management to produce and maintain suitable RCW habitat conditions. A total

conditions. Also, a point that has always confused us about this issue is that while the Forest Service has evidence from the Francis Marion and the Vernon District of the Kisaichie that it can expand RCW populations while continuing to practice even-aged management with clearcutting, it has abandoned this silvicultural mode for one that is completely untested and appears from the outset to be flawed.

Finally, while we realize that the Forest Service is doing its best to respond to the environmental interests of the American public, we are concerned about the rapid change in the interpretation of what the national forests are for. Indeed, this question was heatedly debated a century ago. Our reading of the history of enabling legislation for the forest reserves which later became the national forests suggests that commodity production was to be one of the important purposes of these lands. Admittedly, the anticipated forest famine that the national forests would buffer against never developed because better conservation developed on private lands. On the other hand, a major deficit in availability of sawtimber relative to demand is increasingly realistic and it is probable within the next two decades. While the national forests only account for about eight percent of the southern forest acreage, they may account for a disproportionate share of the production of sawtimber managed on a sustainable basis. But if timber production drops drastically, how will the national forests satisfy the original congressional intent for their establishment.

In our opinion, while the RCW is a high profile issue, it is only one of many issues that bring great complexity to decisions as to what is right and what is wrong in natural resource management. We realize the Forest Service personnel are laboring intensively under this very heavy load. We urge you to consider that the ultimate importance of the national forests may not be to serve as biological reserves in the sanctuary sense, but instead as forests that demonstrate how to integrate the production of commodity goods and services required by American society with the conservation of biological diversity.

Thank you again for the opportunity to comment on this document.

Regards,

*Wayne Tucker*

Wayne Tucker  
PR Forester

VLT/jw

hands-off approach is not fully considered within the range of alternatives described. The preferred alternative provides for a variety of management activities which will promote the conservation and recovery of the RCW while providing a variety of goods and services to the public.

Received 3/25/94  
RCW

187  
BIENVILLE QUAIL ASSOCIATION

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March 22, 1994

To: RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Rd., NW Room 718N  
Atlanta, GA 30367

From: Warner C. Snell *Warner C. Snell*  
Chairman  
Blenville Quail Association

Re: Draft Environmental Impact Statement for the management of the Red-  
Cockaded Woodpecker and its habitat on National Forests in the  
Southern region.

In light of the declining RCW population on the Blenville National Forest and relatively low funding and staffing levels for both the Blenville and Strong River Ranger Districts, a goal of 500 active RCW colonies on the Blenville National Forest is, we believe, unrealistic. Adopting this unrealistic goal will likely result in the further neglect of habitat for other wildlife species (some of which, such as Native Bobwhite Quail, are also declining) and will result in the RCW receiving an even more disproportionate and more inequitable share of limited Forest Service wildlife resources.

The timber stands **within** the RCW colony sites on the Blenville National Forest (including pines) on which RCW populations are **declining** are significantly more dense than those on the Noxubee National Wildlife Refuge (some 80 miles N.E. of Blenville) on which RCW populations are **increasing** (see figure 1 attached from materials prepared by the Wildlife and Fisheries Department staff at Mississippi State University.) Additional thinning and mid-story removal, we submit, is needed within existing RCW colony sites on the Blenville National Forest.

The "closed canopy" timber densities to be maintained in this EIS do not, we submit, meet the open canopied, "park-like" habitat requirements for RCW. As a result of existing timber densities, it appears that RCWs on the Blenville National Forest are abandoning colony sites in the more dense timber stands and are moving into the "seed tree" pine regeneration sites in an attempt to obtain the "openess" they require. Additional timber thinning, it appears, are also needed in many of the dense timber stands on the Blenville National Forest - not a continuation of a "closed canopy" pine timber stocking rate policy which has contributed to a declining RCW population and a declining native Bobwhite Quail population on the Blenville National Forest.

Response to Comments in Letter No. 187

From: Warner Snell, Blenville Quail Association

Comment No. Response

1. The U.S. Fish and Wildlife Service Red-cockaded Woodpecker (RCW) Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. One of the areas identified to meet this RCW Recovery Plan objective is the Blenville National Forest in Mississippi. In the absence of population-specific reproductive data, 500 active clusters will be needed to provide the required minimum of 250 reproducing RCW groups necessary to maintain long-term viability.  
  
There are many plant and animal communities associated with the same fire dependent ecosystems which support(ed) healthy RCW populations. Current information indicates that, like the RCW, many of the species associated with these communities are also in decline. Because the establishment of relatively large Habitat Management Areas (HMA) provides consistent forest management at the landscape scale, these plant and animal communities will also benefit from this approach. Preliminary data on Bobwhite quail studies indicates that implementation of the management direction for RCW may be beneficial to native quail populations.
- 2-3. Controlling woody midstory species and thinning pine stands are essential activities in the production and maintenance of quality RCW nesting and foraging habitat. All alternatives described in the FEIS for Management of the RCW and its Habitat On National Forests in the Southern Region encourage these activities and recognize that thinning is the primary silvicultural activity needed to create the open park-like stands preferred by RCW. The thinning guidelines described in the FEIS generally agree with the pine basal areas presented in RCW literature needed to create these conditions.
4. Comment noted. All alternatives described in the FEIS allow a variety of mechanical, chemical and manual techniques for controlling large midstory hardwoods. The shearing blade method you refer to is among them. Site-specific information as to cost and efficacy of control will determine the most appropriate method(s).
5. Comment noted. Again, the prescribed burning frequencies described in the FEIS (every 2-5 years) are believed to be what is needed to meet desired RCW habitat conditions.



# BIENVILLE QUAIL ASSOCIATION

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The chemical injection method of mid-story control employed on the Blenville National Forest has not been effective in maintaining a suitable "park-like" environment for the RCW on the Blenville National Forest. The obviously more effective and (apparently) more efficient mechanical (V-shear blade) method of mid-story removal employed by the U.S. Fish and Wildlife Service on the Noxubee National Wildlife Refuge should, we submit, be employed on the Blenville National Forest. In addition, the more frequent burning rotation for RCW colony sites (3 years) employed on Noxubee should also be employed on the Blenville National Forest (see attached article by Richardson and Smith.)

At present, areas of several hundred acres adjacent to RCW colony sites on the Blenville National Forest are burned at the same time that the RCW colony sites are burned. This practice does not include adequate provision for nesting cover, protective cover, or food sources for Native Bobwhite Quail or other ground nesting - ground feeding birds and animals. Therefore, we request that consideration be given to RCW colony site (cluster) burns being conducted in different years from litter-control, timber-production-oriented burns of adjacent timber stands in order that some nesting cover, protective cover, and food sources for Native Bobwhite Quail are available on these areas each year.

Thank you for your consideration.

## Attachments

CC: Senator Thad Cochran  
Senator Trent Lott  
Congressman G.V. Montgomery  
Mississippi Wildlife Federation  
Forest Supervisor Johnson  
Selected Individuals

6. Commented noted. While it is recognized that growing season prescribed fire may temporarily remove nesting cover and destroy the existing nests of ground nesting birds in the area, the overall benefits derived from increasing the herbaceous ground layer for future protective cover outweigh the short-term nest losses. In addition to this, there is evidence that the quality brood-rearing habitat provided by these burns may lead to higher young to adult recruitment rates.

Some of the short-term impacts can be minimized by the timing of the burn, the size and shape of the burn area, the burning conditions existing on the day of the burn, and the firing techniques used. Again, the issues and objectives related to the actual implementation of a particular prescribed burn are best addressed at the local level.



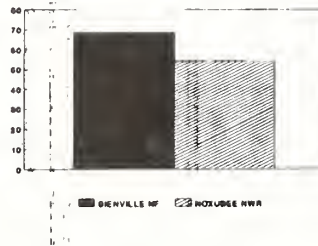
FIGURE 1.

SELECTED STRUCTURAL COMPONENTS OF STANDS  
MANAGED FOR RED-COCKADED WOODPECKERS  
VALUES ARE AVERAGES BASED ON 0.02 HA CIRCULAR PLOTS  
Bienville (n = 280) Noxubee (n = 240)

HARDWOOD MIDSTORY  
(PERCENT COVER)



TREE CANOPY  
(PERCENT COVER)



HARDWOOD STEM DENSITY  
(NUMBER PER HA)

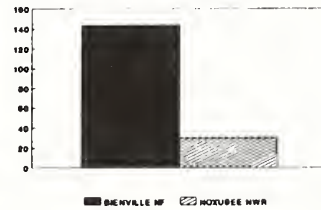


FIGURE 2. MULTIVARIATE COMPARISONS OF RCW AND UNMANAGED STAND STRUCTURE AT BIENVILLE NATIONAL FOREST AND NOXUBEE NATIONAL WILDLIFE REFUGE

BIENVILLE NATIONAL FOREST  
"1" = Unmanaged Stand  
"2" = RCW Stand

[illegible]

**DISCRIMINANT SCORES**

NOXUBEE NATIONAL WILDLIFE REFUGE  
"1" = Unmanaged Stand  
"2" = RCW stand

[illegible]

## DISCRIMINANT SCORES

## HARDWOOD REMOVAL IN RED-COCKADED WOODPECKER COLONIES USING A SHEAR V-BLADE

DAVID M. RICHARDSON, U.S. Fish and Wildlife Service, Nezahce National Wildlife Refuge, Brooksville, MS 39739

DAVID L. SMITH,<sup>1</sup> U.S. Fish and Wildlife Service, Nezahce National Wildlife Refuge, Brooksville, MS 39739

Red-cockaded woodpeckers (*Picoides bo-* son 1971, Lennartz et al. 1983). This bird is  
*realla*) are endemic to mature pine (*Pinus* spp.) uniquely dependent on living old-growth pine  
stands in the southeastern United States (Jack- trees for excavating roost and nest cavities (U.S.

Fish and Wildl. Serv. 1985). Hardwood en-  
croachment around cavity trees may cause in-  
dividuals or a colony to abandon cavities (Van

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Balen and Doerr 1978, Locke et al. 1983). Conner and Rudolph (1989) found midstory presence associated with inactive colonies. The importance of maintaining open, park-like pine stands for nesting habitat has been emphasized in the Red-cockaded Woodpecker Recovery Plan (U.S. Fish and Wildl. Serv. 1985:50) and the Scientific Summit on the Red-cockaded Woodpecker (Georgia Inst. Technol. 1990:12-13), which stipulated a hardwood basal area of  $<4.6 \text{ m}^2/\text{ha}$  in the colony and removal of hardwood stems  $>2.5 \text{ cm}$  diameter at breast height (dbh) within 15.2 m of cavity trees.

Hardwood trees have been managed in colonies by prescribed burning, herbicides, and mechanical clearing (primarily chainsaws) (Costa and Escano 1989). Historically, the southern pine ecosystem was maintained through periodic summer wildfires (Jackson et al. 1986, Jackson 1988), but prescribed burning during the nongrowing season is not as effective as summer fires at controlling hardwood growth (Langdon 1981). Herbicides have been widely used by the forest industry to control hardwoods in pine stands (Miller 1984) but restrictively for management of red-cockaded woodpecker habitat (Costa and Escano 1989). Conner (1988) proposed the use of herbicides for hardwood control in colonies and suggested a 1-time application of hexazinone. Hand clearing with chainsaws is feasible but impractical if the need for hardwood removal is extensive. Roller-chipping colonies that have numerous small stems is effective but difficult for sites with hardwood stems  $\geq 10 \text{ cm}$ , and may cause root damage to pine trees during chipping of larger trees adjacent to pines.

Shearing has been widely used in the forest industry as a site-preparation method primarily for pine planting (Stafford et al. 1984). This technique has potential for removing hardwoods from red-cockaded woodpecker colonies because stem density and tree size do not affect shearing operations. Our objective was to evaluate the use of a shear V blade to remove extensive hardwood encroachment in ac-

tive and inactive red-cockaded woodpecker colonies in east central Mississippi.

## METHODS

Hardwood trees in 7 active and 4 inactive red-cockaded woodpecker colonies were sheared at Natchez National Wildlife Refuge (NWR) in east central Mississippi between 1987-1990. Colony sites were predominantly loblolly pine (*Pinus taeda*) with some shortleaf pine (*P. echinata*) hardwood trees in colonies included southern red oak (*Quercus falcata*), post oak (*Q. stellata*), hickories (*Carya* spp.), and sweetgum (*Liquidambar styraciflua*). Midstory and overstory hardwood stem diameters ranged from 10-40 cm dbh. All colonies had been prescribed-burned in winter or early spring at 2- to 3-year intervals during the past 20 years.

A shear V blade with a 55-cm serrated cutting edge was attached to either a Caterpillar D-8 or an International T120 tractor. Hardwood trees were sheared by keeping the blade at ground level and bumping the cutting edge against the base of the tree. Felling trees  $<20 \text{ cm}$  dbh required 1 push with the blade. Larger trees often required the operator to make a cut on each side of the tree base and then push the tree slightly with the nose of the blade to fell the tree. At least 4 ha in each colony were sheared; entire colony sites were sheared if they were  $<4 \text{ ha}$  in size. Some hardwood trees (oak and hickory) were left in colony sites to prevent large openings from being created or to retain some diversity when the hardwood trees did not encroach on adjacent pine trees. Shearing was done during July-November to minimize disturbance of nesting woodpeckers. Colonies were monitored within 1 month after shearing and then annually to determine if they were active. Nine other active colonies not receiving treatment also were monitored annually. After shearing, 5 active and 2 inactive colonies were opened to the public from September-November to cut the downed trees for firewood.

Measurements of basal area and hardwood stem density were not made prior to shearing a colony. We estimated the relative difference of hardwood basal area and stem density in colonies by comparing the portion of the pine stand encompassing the colony site that was sheared to the unheared portion. Though the estimated values for the unheared portion of the stand may be slightly disparate from the sheared colony site, they provided an approximation for the hardwood basal area and density removed in a colony. The pine stands containing 2 active and 2 inactive colonies were sheared in their entirety, so we could not estimate hardwood basal area and stem density in those stands. Basal area and hardwood stem density were estimated for each sheared colony and adjacent unheared portion of the pine stand from 8-10 randomly located 0.04 ha circular plots. Only hardwood stems  $\geq 10 \text{ cm}$  dbh were counted and measured because smaller stems added  $<0.1 \text{ m}^2/\text{ha}$  to basal area measurement. All stand area

Table 1. Mean (SE) area sheared, pine and hardwood basal area, and hardwood stem density for 5 active and 2 inactive red-cockaded woodpecker colonies in which hardwood encroachment was reduced with a shear V-blade at Natchez National Wildlife Refuge in east-central Mississippi, 1987-1990.

Stand condition	Area (ha) sheared	Basal area (m <sup>2</sup> /ha)		Stems/ha <sup>a</sup>
		Pine	Hardwood	
Unsheared <sup>b</sup>	— <sup>c</sup>	15.2 (0.44)	6.3 (0.53)	250 (44.8)
Sheared	7.4 (2.8)	13.7 (0.93)	1.1 (0.31)	13 (3.4)

<sup>a</sup> Only includes hardwood stems  $\geq 10$  cm dbh.

<sup>b</sup> Represents the portion of the pine stand encompassing the colony that was not sheared.

<sup>c</sup> Area of the unsheared portion of the pine stand encompassing the colony was not estimated.

measurements were taken during summer 1991. A Wilcoxon signed ranks test (Conover 240-248) was used to compare basal area and stem density between the sheared colonies and unsheared sites.

## RESULTS

Seven active and 4 inactive colony sites were extensively cleared of midstory and overstory hardwood trees (Table 1). Pine basal area did not differ ( $P > 0.05$ , 6 df,  $t = 1.52$ ) between the sheared colony and unsheared sites. However, hardwood basal area in the sheared colonies was less ( $P < 0.01$ , 6 df,  $t = 2.37$ ) than the unsheared sites (Table 1). Mean density of hardwoods also was less ( $P < 0.01$ , 6 df,  $t = 2.37$ ) in the sheared colonies compared to unsheared sites (Table 1). The number of hardwood trees in the sheared colonies ranged from 5-28 trees/ha compared to 75-420 trees/ha in the unsheared sites. No pine trees were found dead following shearing. The 7 sheared and 9 unsheared active colonies remained active through the period 1987-1991. Nesting activity was not monitored closely during the year following shearing of a colony; however, 6 and 7 of the sheared active colonies contained successful nests in 1990 and 1991, respectively. None of the 4 inactive colonies have been recolonized. During 1991, 2 birds began roosting in 2 cavity inserts (Allen 1991) in an inactive colony sheared in 1988, although they nested in their own colony. Shearing cost approximately \$74/ha including labor and fuel costs and required 2-5 days/colony to accomplish depending on the area sheared.

## DISCUSSION

Shearing hardwood trees in a colony and the associated pine stand caused a dramatic alteration in habitat structure. It provided a method to refurbish colony sites with extensive hardwood encroachment that could not be easily controlled through prescribed burning or other mechanical methods. Van Balen and Doerr (1978), Locke et al. (1983), and Hovis and Labisky (1985) indicated the need for maintaining old-growth pine stands with a sparse hardwood component because they seem to provide more optimal nesting habitat compared to similar-age stands with a greater basal area of hardwood. Although Jackson (1990) suggested that the abandonment of 5 colonies was caused by extensive removal of understory at the Savannah River Plant in South Carolina in 1980, the 7 active colonies we sheared remained active. Our hardwood control was done outside of the nesting period, unlike that reported by Jackson (1990), and this may have reduced disturbance to the birds and prevented abandonment. Furthermore, Conner and Rudolph (1991) reported that a similar reduction of hardwood basal area within the colony cluster and a 61-m buffer zone did not cause abandonment of 16 active bobwhites that were treated. Therefore, drastic habitat changes apparently can be tolerated by red-cockaded woodpeckers provided that the manipulation does not occur during the breeding season.

Though none of the 4 inactive colonies have been recolonized, only 1 that was sheared in



1988 has possibly had sufficient time for recolonization. The other 3 inactive colonies were sheared during late summer and fall 1990, and given the small population on the refuge (18 colonies), dispersing juveniles perhaps only now would be encountering them. Also, the cavities at these sites were enlarged by pileated woodpeckers (*Dryocopus pileatus*), making them unsuitable for red-cockaded woodpeckers. Although birds from an active colony were observed during 1990 foraging in an adjacent inactive colony that was sheared during 1988, they only began roosting at the site after installation of 2 cavity inserts during spring 1991. Thus, by creating artificial cavities (Copeyon 1990, Taylor and Hooper 1991), installing cavity inserts (Allen 1991), or use of restrictors (Carter et al. 1989) on enlarged cavities, the other inactive colonies could be made more acceptable for recolonization (Copeyon et al. 1991). Improvements in old colony sites near active colonies most likely offer the greatest potential for recolonization and population growth (Conner and Rudolph 1989).

Given the size (10–40 cm d.b.h.) and number of the hardwood trees in the colonies, shearing presented the only practical method for removal. Limited markets for hardwood pulp in the area made it impossible to remove hardwoods through timber sales. Public firewood cutting of standing oak and hickory trees in colonies has been allowed at Noxubee NWR and has been successful. The drawback to firewood cutting is that less desirable species, like sweetgum or small-stemmed trees, are left standing. Herbicide application to control hardwoods may take several years to kill trees (Conner 1989). Some colonies may become inactive if hardwood encroachment is not controlled in a more timely manner. We also attempted to roller-chop 2 of the colony sites but abandoned this method because it required uprooting the tree, was very difficult with large trees, and could cause root damage to adjacent pines with cavities. However, roller-chopping

small stems has proven extremely effective at Carolina Sandhills NWR, where hardwoods at approximately 60 active colonies have been chopped on a 5-year rotational basis (D. Robinson, Carolina Sandhills NWR, McBe, S.C., pers. commun., 1991).

Public removal of sheared trees in the colony sites for firewood greatly reduced the debris, which posed a fire hazard. This may reduce attraction of foraging, pileated woodpeckers (Ikenken and Wiggers 1989), which are known to enlarge cavity entrances (Jackson 1978, Conner et al. 1991). Although considerable time was spent in each colony by firewood cutters and the tractor, the noise did not seem to cause any long-term effect. Jackson (1983) reported that red-cockaded woodpeckers subjected to noise levels of up to 95 decibels nested successfully but indicated continual noise adjacent to nest cavities may cause nest failure. Cutting during midday from July through November probably reduced disturbance because red-cockaded woodpeckers would be foraging outside of the colony site, and this period did not encompass the breeding season.

Compared with average costs for midstory hardwood control in colonies using herbicides (\$156/ha) (Costa and Escano 1989) or chainsaws (\$124/ha) (L. Costa, Apalachicola National Forest, Tallahassee, Fla., pers. commun., 1991), shearing (\$74/ha) seems to provide a more cost-effective method for reducing hardwoods. Once midstory hardwoods are under control, prescribed burning during the growing season (\$30/ha) (Costa and Escano 1989:24) on a frequent basis can be the most efficient and economical method for colony management. We concur with Conner and Rudolph (1991) that hardwood removal should continue in colonies and be done during the nonbreeding season to prevent interference with nesting and minimize disturbance to the birds. Additionally, we recommend the use of the shear V-blade be expanded as a management technique to modify pine stands with an

✱✱

extensive hardwood component for potential colony sites. Installing cavity inserts (Allen 1991) or creating artificial cavities (Capeyon 1980, Taylor and Hooper 1991) within these sites should be done to encourage colonization by red-cockaded woodpeckers (Capeyon et al. 1991).

#### SUMMARY

A shear V-blade to remove hardwood encroachment in 7 active and 4 inactive red-cockaded woodpecker colonies was evaluated at Noxubee NWR during 1987-1990. No colony abandonment occurred following shearing operations during the nonbreeding season. Shearing provided a cost-effective management technique to remove hardwoods in colonies compared to herbicides or hand clearing and is especially suited to sites with extensive hardwood encroachment. This technique can be expanded to create potential colony sites as well.

**Acknowledgments.**—We appreciate the assistance of tractor operators E. Gillespie and C. Smith. Reviews and comments by L. A. Brennan, R. Conner, C. Hunter, D. F. Stauffer, J. Walters, and an anonymous reviewer improved earlier drafts of this manuscript.

#### LITERATURE CITED

- ALLEN, D. H. 1991. An insert technique for constructing artificial red-cockaded woodpecker cavities. *U.S. For. Serv. Gen. Tech. Rep.* SE-73: 19pp.
- CARTER, J. H., III, J. R. WALTERS, S. H. EVERHART, AND P. D. DODGE. 1989. Restrictions for red-cockaded woodpecker cavities. *Wildl. Soc. Bull.* 17:68-72.
- CONNER, R. N. 1989. Injection of 2,4-D to remove hardwood midstory within red-cockaded woodpecker colony areas. *U.S. For. Serv. Res. Pap.* SO-251: 4pp.
- \_\_\_\_\_, AND D. C. RUDOLPH. 1989. Red-cockaded woodpecker colony status and trends on the Angelina, Davy Crockett, and Sabine National Forests. *U.S. For. Serv. Res. Pap.* SO-250: 15pp.
- \_\_\_\_\_, AND \_\_\_\_\_. 1991. Effects of midstory reduction and thinning in red-cockaded woodpecker cavity tree classes. *Wildl. Soc. Bull.* 19:63-66.
- \_\_\_\_\_, D. L. KULHAVY, AND A. F. SNOW. 1991. Causes of mortality of red-cockaded woodpecker cavity trees. *J. Wildl. Manage.* 55:531-537.
- CAPAYON, W. J. 1980. Practical nonparametric statistics. John Wiley and Sons, New York, N.Y. 489pp.
- CORRYOW, C. K. 1990. A technique for constructing cavities for the red-cockaded woodpecker. *Wildl. Soc. Bull.* 18:303-311.
- \_\_\_\_\_, J. R. WALTERS, AND J. H. CARTER. 1991. Induction of red-cockaded woodpecker group formation by artificial cavity construction. *J. Wildl. Manage.* 55:549-556.
- CORTA, R., AND R. E. F. ESCANO. 1989. Red-cockaded woodpecker status and management in the southern region. *U.S. For. Serv. Tech. Publ.* R8-TP-12: 71pp.
- GEORGIA INSTITUTE OF TECHNOLOGY. 1990. Scientific summit on the red-cockaded woodpecker. summary report. Southeast Negotiation Network, Georgia Inst. Technol., Atlanta. 36pp.
- HOVIS, J. A., AND R. F. LANSKY. 1985. Vegetative associations of red-cockaded woodpecker colonies in Florida. *Wildl. Soc. Bull.* 13:307-314.
- JACKSON, J. A. 1971. The evolution, taxonomy, distribution, past populations and current status of the red-cockaded woodpecker. Pages 4-29 in R. L. Thompson, ed. *The ecology and management of the red-cockaded woodpecker*. U.S. Dep. Inter., Bur. Sport Fish and Wildl., and Tall Timbers Res. Stn., Tallahassee, Fla.
- \_\_\_\_\_. 1978. Competition for cavities and red-cockaded woodpecker management. Pages 103-112 in S. A. Temple, ed. *Endangered birds, management techniques for preserving threatened species*. Univ. Wisconsin Press, Madison.
- \_\_\_\_\_. 1983. Possible effects of excessive noise on red-cockaded woodpeckers. Pages 38-40 in D. A. Wood, ed. *Proc. red-cockaded woodpecker symposium II*. Fla. Game and Fresh Water Fish Comm., Tallahassee.
- \_\_\_\_\_. 1988. The southeastern forest ecosystem and its birds: past, present, and future. Pages 119-159 in J. A. Jackson, ed. *Bird conservation 3*. Int. Council for Bird Preservation (U.S. sect.), Univ. Wisconsin Press, Madison.
- \_\_\_\_\_. 1990. Intercolony movements of red-cockaded woodpeckers in South Carolina. *J. Field Ornithol.* 61:149-155.
- \_\_\_\_\_, R. N. CONNER, AND B. J. S. JACKSON. 1986. The effects of wilderness on the endangered red-cockaded woodpecker. Pages 71-78 in W. L. Kulhavy and R. N. Conner, eds. *Wilderness and natural areas in the eastern United States: a management challenge*. School For., Stephen F. Austin State Univ., Nacogdoches, Texas.
- LANGDON, O. C. 1981. Some effects of prescribed fire on understory vegetation in loblolly pine stands. Pages 149-153 in W. C. Wood, ed. *Prescribed fire and wildlife in southern forests*. Belle W. Baruch For. Sci. Inst., Clemson Univ., Georgetown, S.C.
- LENNARTZ, M. R., P. H. GESSLER, R. F. HARLOW, R. C. LONG, K. M. CUTWOOD, AND J. A. JACKSON. 1983. Status of the red-cockaded woodpecker on federal lands in the South. Pages 7-12 in D. A. Wood, ed.

- Proc. red-cockaded woodpecker symposium II. Fla. Game and Fresh Water Fish Comm., Tallahassee.
- LOUGER, B. A., B. N. CONNER, and J. C. KROTT. 1983. Factors influencing colony site selection by red-cockaded woodpeckers. Pages 46-50 in D. A. Wood, ed. Proc. red-cockaded woodpecker symposium II. Fla. Game and Fresh Water Fish Comm., Tallahassee.
- MILLER, J. H. 1984. Where herbicides fit into forest management schemes. Pages 1-13 in K. Ray, ed. Proc. fourth annual forestry forum. Herbicides: prescription and application. Clemson Univ. Coop. Ext. Serv., Dep. For., Clemson, S.C.
- RENKEN, R. B., and E. P. WIGGINS. 1989. Forest characteristics related to pileated woodpecker territory size in Missouri. *Condor* 91:642-652.
- STAFFORD, C. W., J. L. TOWNENT, and J. A. BURGER. 1984. An evaluation of site preparation methods for loblolly pine regeneration on the Piedmont. Pages 57-60 in E. Shoulders, ed. Proc. third biennial southern silviculture research conference, U.S. For. Serv. Southeast For. Exper. Sta., Atlanta, Ga.
- FAYTON, W. E., and W. G. HICORTH. 1991. A modification of Copeyoun's drilling technique for making artificial red-cockaded woodpecker cavities. U.S. For. Serv. Gen. Tech. Rep. SE-72. 31pp.
- U.S. Fish and Wildlife Service. 1965. Red-cockaded woodpecker recovery plan. U.S. Fish and Wildlife Serv., Atlanta, Ga. 86pp.
- VAN BALEN, J. B., and P. D. DODGE. 1978. The relationship of understory vegetation to red-cockaded woodpecker activity. *Proc. Annu. Conf. Southeast Assoc. Fish and Wildl. Agencies* 32:82-92.

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Received 3/25/94  
RCW

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March 23, 1994

RCW ELS Team Leader  
U. S. Forest Service  
1720 Peachtree Road, N.W.  
Room 718N  
Atlanta, GA 30367

Dear Sir::

At a recent meeting of the Scott County Board of Supervisors, the Board thoroughly discussed information provided to them regarding the Red Cockheaded Woodpecker. The Board of Supervisors is extremely concerned about measures being considered by the U. S. Forest Service regarding protection of this species. The Scott County Board of Supervisors is against any plan or program regarding this species which would impact negatively upon the timber industry of our area. The County presently receives substantial revenue from the U. S. Government which is used to assist in the road maintenance throughout the County. Furthermore, the timber industry is one of the largest employers in our area. Therefore, we respectfully submit our position against any plans which adversely effect timber production in our area.

Respectfully submitted,

SCOTT COUNTY BOARD OF SUPERVISORS

BY: *Tom Ed Waggoner*  
TOM ED WAGGONER

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Response to Comments in Letter No. 188  
From: Tom Ed Waggoner, Scott County Board of Supervisors

Comment No.                      Response

1. Comment noted.



Re RCW  
5/20/94  
189

FLORIDA CHAPTER  
THE WILDLIFE SOCIETY



114 Meridian Hills Road  
Tallahassee, FL 32312  
(904) 668-3469

March 24, 1994

Mr. Joseph M. Dabney  
Red-cockaded Woodpecker EIS Team Leader  
1720 Peachtree Road, NW, Room 718N  
Atlanta, GA 30367-9102

Dear Mr. Dabney:

The Florida Chapter of The Wildlife Society appreciates the opportunity to comment on the *Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region (DEIS)*. In general, we believe that the proposed action (Alternative E) is a reasonable plan that will aid in the recovery of the red-cockaded woodpecker (RCW).

The proposed direction is to "apply an ecosystem management approach at the landscape level, focusing on restoration of habitat conditions under which the RCW evolved." We believe that this direction represents a desirable goal. However, although we believe that the guidelines may allow that goal to be reached, the guidelines do not necessarily lead to reaching that goal. Our reasoning is that many decisions that will influence how good an ecosystem management approach is taken are not being (and probably should not be) made with this EIS. Rather, the on-the-ground decisions will be made elsewhere. We feel that using management practices that mimic natural processes is an important aspect of an ecosystem management approach. As such, it is important to know where and when the decisions on what management practices to use will be made. For example, the proportion of a forest to be managed under an even-aged versus uneven-aged management system will influence how well natural disturbance processes are mimicked. After discussions with the Forest Service, we understand that these types of

Response to Comments in Letter No. 189  
From: Brian Millsap, Florida Chapter of the Wildlife Society

Comment No.	Response
1.	<p>The Draft EIS for RCW does not and cannot make site specific decisions related to management practices. Forest plans and subsequent site specific projects based on these Forest Plans will have a fully substantiated programmatic Environmental Impact Statement and a detailed Environmental Analysis. Forest Plans make the following decisions:</p> <p>The law specifically states that Plan decisions establish:</p> <ul style="list-style-type: none"><li>• Forest-wide multiple use goals and objectives, 36 CFR 219.11(b);</li><li>• Forest-wide management requirements, 36 CFR 219.27;</li><li>• Management area direction, 36 CFR 219.11(c);</li><li>• Lands suitable for timber production, National Forest Management Act (NFMA) Section 6(g) (2) (A) and 36 CFR 219.14; and establishment of ASQ 219.16;</li><li>• Monitoring and evaluation requirements, 36 CFR 219.11(d);</li><li>• Recommendations for Wilderness, Wild and Scenic Rivers, 36 CFR 219.17;</li><li>• Site specific decisions unique to the Forest Plan identified in the Record of Decision (ROD); and</li><li>• Mineral leasing availability via 36 CFR 228, Subpart E.</li></ul>

Site-specific project activity level decisions, except for mineral leasing, are not made in this Forest Plan unless they are deemed significant enough to become a part of the ROD and fully analyzed to meet NEPA requirements. Statutory obligations require site-specific analysis of projects and activities prior to their implementation. This is commonly referred to as the two-step decision making process. Projects analyzed in the second stage must comply with Forest Plan decisions and the Final Environmental Impact Statement (FEIS).

Site specific projects are detailed, extrapolation of Forest Plan objectives, provide specificity such as, description of prescribed fire needs and the amount of growing season burning proposed.

Forest Plan Goals and Objectives and the Management Area DFC establish a framework for activities such as restoration, timing of prescribed fire, and vegetation management.



Mr. Joseph M. Dabney  
March 24, 1994  
Page Two

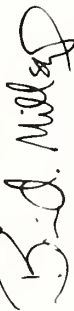
decisions will be made in the forest plan revisions. Because this is not clear in the DEIS, we suggest that you provide examples of the types of decisions that will be made in the forest plans that effect the implementation of an ecosystem management approach.

- 2 Some additional examples of concerns that our reviewers raised that illustrate the
- 3 confusion of where decisions will be made (regional strategy versus forest plan) include: will
- 4 the level of hardwood cutting increase as a result of the restrictions on pine harvest; what
- proportion of the overall prescribed burning program will be accomplished during the growing
- season; and why certain activities (pine restoration, growing season burning) are encouraged or
- emphasized rather than mandated?

In short, while we believe the DEIS provides a good overall framework for managing red-cockaded woodpeckers on National Forests in the Southern Region, it is unclear how and at what levels the on-the-ground decisions will be made. We believe the DEIS should address this issue.

Please call if you have any questions about our comments.

Sincerely,



Brian A. Millsap, President  
Florida Chapter of The Wildlife Society

cc: Executive Board  
Dr. Jim Müller  
Dr. Dean Beyer

190

Roe RCW 3/25/94

4130 Arklow Drive  
Tallahassee, Florida 32308  
904/894-0378 (h); 904/488-3831 (w)

March 24, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road, NW, Room 718N  
Atlanta, Georgia 30367-9102

Dear Mr. Dabney:

Thank you for the opportunity to provide comments on the *Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region* (DEIS).

I am fortunate to live in Tallahassee, Florida, with the Apalachicola National Forest at my back door. I consider the forest to be a true treasure of natural resources that is our responsibility to safeguard and nurture for today and for all generations to come. It is important to me that the longleaf pine and wiregrass community and the populations of all its inhabitants, including the red-cockaded woodpecker (RCW), be restored and managed as responsibly as possible. The decline of RCW populations is alarming, but if efforts towards its recovery are successful in infusing a sincere "ecosystem approach" to the management of our national forests, the little bird's plight will have been to the ultimate advantage of the entire forest ecosystem.

The DEIS states that "the proposed new Regional direction would apply an ecosystem management approach, at the landscape level, focusing on the restoration of the habitat conditions under which the RCW evolved." This is good news, although I would point out that there are several aspects of the Proposed Action (Alternative E) in which I feel the ecosystem management objective falls short. Specifically, I have concerns about:

1. **Proposed minimum rotation lengths.** Just as in the Pacific Northwest, the Southeast has the potential to restore and conserve its old-growth forest; let's make it a reality! My preference would be to end all timber harvest on national forests, since I believe that all of this country's timber and paper-product needs can easily be met by the forests on private land. I would want this to be the ultimate goal of the Forest Service as well, but recognizing the current multiple-use mandate, I suggest the following compromise. Until such time as timber harvest on national forests ends, the minimum rotation for all pine species used by the RCW should be 200 years.

Response to Comments in Letter No. 190.

From: David G. Cook

Comment No. Response

1. Rotations are proposed in the DEIS that best provide habitat conditions for RCW. These rotations are based on the best science known about each specific pine species. These rotations will provide an adequate supply of RCW habitat through time, but it would be potentially catastrophic to propose 200 year rotations for short lived species such as loblolly, Virginia or slash pine.
2. Prescribed fire is a major component in the management of all pine dominated uplands in the south; it is a benchmark tool proposed in the DEIS. Growing season fire is emphasized, but it would be inappropriate to mandate its use in all situations without programmatic (Forest Plan), and site specific (prescribed burning plan and/or project) analysis of each site proposal for prescription burning.
3. Site preparation may range from minimal disturbance (low, cool season fire) to extremes (clearcutting and burning). In some cases, especially for species restoration, extreme site preparation activities may be the only methods to reach the desired goal. In other cases, minimal disturbance may be adequate. These decisions will be made on a site specific basis as described in Forest Plans and Project (Environmental) Analysis.
4. As stated, the RCW EIS is designed to ensure survival of the species on USFS lands in the south. It has many aspects that will benefit plant and animal species associated with southern upland pine ecosystems; however it is not the role of this document to ensure sustainability of all ecosystems in the south.

Mr. Joseph M. Dabney  
March 24, 1994  
Page 2

2. Use of prescribed fire. Rather than merely "emphasizing" prescribed fire, including growing season burns, the DEIS should mandate use of growing season fire as the primary management tool. The exception would be in instances where such fire has been precluded for so long that its immediate application would be likely to result in catastrophic fire; here, cool-season burning or clearing by hand could be applied to make hardwoods manageable by successive growing season burning. (This exception should not apply to sand pine scrub, such as occurs on the Ocala National Forest, for which periodic catastrophic fire is the natural regeneration factor.)

3. Regeneration methods. Site preparation is the most egregious example of "not seeing the forest for the trees," and is not compatible with ecosystem management objectives. The disturbance, compaction, displacement, and destruction of a forest's topsoil and its diverse community of groundcover plant species that occurs during site preparation and timber operations is in direct opposition to the purported goal of restoring, healing, and perpetuating ecosystems in as natural a state as possible.

I hope that sound ecosystem management does indeed become the heart and soul of Forest Service, and I hope that the goal to return the national forests to their natural state with their complete complements of coadapted species becomes a reality, at least in my children's children's lifetimes. The RCW DEIS is the most encouraging Forest Service document I've seen, and I think it that its thoughtful implementation will indeed help ensure the long-term survival of the red-cockaded woodpecker. However, as I've tried to indicate above, I don't think it goes nearly far enough to ensure the long-term survival of the ecosystem in which the RCW and its companion plant and animal species evolved.

Thank you very much for your consideration of my comments.

Sincerely,



David G. Cook

cc: Dr. Walter Tschinkel,  
Friends of the Apalachicola  
National Forest

191  
RCW  
3/25/94

20 March 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Rd. NW  
Room 718N  
Atlanta, Georgia 30367-9102

Dear Joe:

Enclosed are my comments. Although you said you wanted specific comments, I felt it necessary to comment on the bigger picture. If those wanting ecosystem management are going to use the RCW to accomplish it, we will have to do a much better job.

However, I believe the present USFS bureaucratic machinery is too cumbersome to handle ecosystem management. To force ecosystem management via the RCW on top of an archaic bureaucratic machine is a nightmare.

I would be glad to discuss at length any questions you have about my comments.

Sincerely,

*W. Wilson*

W. Wilson Baker  
1422 Crestview Ave.  
Tallahassee, Florida 32303

191 wpd

Response to Comments in Letter No. 191

From: W. Wilson Baker

1. Comment noted.
2. The Draft EIS for RCW is a regionally developed document that involves all southern forest ecosystems and not just longleaf pine systems or a single forest. This EIS does not make site specific decisions related to management practices. Forest plans and subsequent site specific projects based on these Forest Plans make those decisions. These planning documents will have a fully substantiated Environmental Impact Statement (for Forest Plans) and a detailed Environmental Analysis (project level) for site specific proposals. The development of these documents will provide the detailed elements of ecosystem components that you have identified.
3. Comment noted. Prescribed fire is a major element of this EIS and specific applications will vary by forest and by site; these specific applications will be clarified in Forest Plans and project level environmental analysis.
4. Implementation of the RCW EIS will require a diversified, highly trained professional staff; however it is beyond the scope of this document to detail the workforce needed to implement this programmatic direction.

Review of the Draft EIS for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region - December 1993; U.S. Dept. Agric., Forest Service

W. Wilson Baker

I will confine my comments to Longleaf Pine and the associated biotic communities and specifically to the Apalachicola National Forest (ANF). For many geological, biological and cultural reasons the ANF is a national and internationally known treasure. This is such a national treasure that it cries for landscape level ecosystem management. How can this be done? --Mimic the natural system of the Longleaf Pine type and its associated biotic communities.

This document started out with great goals: Mimic the system in which Red-cockaded Woodpeckers (RCW) evolved. It then proceeded to talk single species management and mostly intensive silvicultural techniques. You can't have it both ways!

This 500-page report which took four<sup>2</sup> years to produce is a mishmash of truths, untruths, many misleading statements and forced economic forestry procedures. If landscape level ecosystem management were practiced, many of the cookbook systems and key elements mentioned would be unnecessary such as: rotation age, basal area, individual stands, etc.

We could learn a lot about ecosystem management from that type of land management practiced on private lands in the Red Hills region of Thomasville, Georgia - Tallahassee, Florida. What are some to the key elements of management in this forest area containing the sixth largest RCW population.

- 1) The land ownerships are treated as a unit; there are no compartments or stands per se
- 2) Timber harvest is on an individual tree selection or small group selection basis
- 3) Timber is not the number one priority
- 4) Fire is used on a regular basis

But what is the real reason for these quality working landscape forests still in existence?

- 5) A few (very few) resource managers cared enough about the total resources of the forested landscape and worked with the landowners toward long-term protection of the diverse landscape.



What are the major threats to this system or our own national forest? Short-term forestry and economics, greed, and being managed by the "average" university trained forester. Is it too much to expect different management on our public lands than produced on industrial forest lands where the number one priority is economics and mill management? Is it heretical to suggest that high quality pinelands (based mainly on understory and underground qualities) be managed where timber value, amount of timber cut, and RCW's are just three values out of thousands on a given National forest. If we practiced longleaf pine ecosystem management and mimicked its natural system the RCW would be one of the by-products. This would eliminate the need for many of the RCW plans--many of which have been half-heartily followed or ignored over the last 25 years.

I guess in summary what I am saying is that this document is woefully lacking in ecological insight and truth.

I had pages of comments referring to poor ecological understanding, misleading statements, dogma, etc., but decided to not specifically reference these. I likewise decided not to comment on the alternatives--the descriptions of alternatives have become a game, a farse. Many alternatives are illegal, poor stewardship, or things "reasonable resource" people would not want to do.

LET'S GET REAL! For example; The ANF is a leader in southern forests on prescribed burning and the use of fire; yet, it isn't close to doing what is needed. In best years it burns only about one-third of what is needed to get on its 3-year rotation. Regular fire is a necessity (not just a valuable tool p. 204), in the longleaf Pine community in which RCW's evolved. We know how to burn. It is the number one tool in ecosystem management. Let's move forward.

After 25 years of foot dragging in RCW and ecosystem management it is exciting to see talk of ecosystem management. However, you can't have ecosystem management as described at the outset of this document with the same "normal" foresters dictating how our forests are managed. We need ecologists, botanist, biologists, field monitoring specialists, full-time fire crews, many more AFSECE members, and yes, foresters, but of a new breed. We have the basic knowledge of how Longleaf Pine forests work, the real questions is do we have the will to let this happen on our public lands. Or the real question: Are we going to allow the price of pine timber, short-term forestry economics and forestry special interest groups, continue to dictate management of our public forests?



South Carolina  
Wildlife & Marine  
Resources Department

James A. Timmerman, Jr., Ph.D.  
Executive Director  
W. Brock Conrad, Jr.  
Director of  
Wildlife and Freshwater Fisheries

March 21, 1994

Mr. Joseph M. Dabney  
RCW-EIS Team Leader  
USDA-Forest Service  
1720 Peachtree Rd. NW, Rm. 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

We have reviewed the "Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region" and offer our detailed comments. We appreciate the tremendous effort that went into preparing this document and found it to be overall very professional and well compiled. The background data and other supporting Red-cockaded Woodpecker (RCW) information, along with the glossaries, index and illustrations make it one of the best and most "user friendly" plans of its type that we have seen.

We support the concept of ecosystem management and believe that the RCW is a keystone species for the most endangered ecosystem in the southeast, the longleaf pine forest. We believe that the strategy of increased prescribed fire (including growing season burns), longer rotations, less reliance on clearcutting, and less intensive site preparation will be beneficial to Red-cockaded Woodpeckers (RCW's) and most other wildlife species, especially the nearly 170 species of sensitive and rare plants and animals listed in Appendix C of the DEIS.

The increased use of prescribed fire will control understory vegetation, increase the quality of understory food plants and reduce the midstory for the RCW's. The longer rotations will allow more of the forest to grow into older age classes thereby increasing the diversity of habitats available to wildlife species. The reduction in mechanical site preparation reduces soil disturbance, which can affect soil productivity and water quality. It also reduces the impacts of regeneration activities on vegetation other than the overstory trees.

We do have some concerns about the effects this new management direction could have on some wildlife species, particularly on the Francis Marion National Forest in South Carolina, which is the only area affected by the DEIS in our state. Hardwood mast is critical for many species including the Wild Turkey, Gray

Rembert C. Dennis Building ☐ P.O. Box 167 ☐ Columbia, South Carolina 29202 ☐ Telephone 803-734-3886

Response to Comments in Letter No. 192

From: South Carolina Department of Natural Resources (formerly South Carolina Wildlife & Marine Fisheries Department)

Comment No. Response

1. Clearcutting is an option available under MIL 1. A site specific evaluation must show a definite long-term benefit to the RCW. Other criteria must be met to allow clearcutting. The use of clearcutting has been limited to conform with the Chief's 1330-1 letter dated June 4, 1992 and with NFMA at 16 U.S.C. 1604 (g) (F) (1). The comment regarding 6 stems per acre is noted. Although the proposal states that 3 trees per acre may be retained, it is also likely that soft mast producing species that are not in the midstory will be present in the stand, as well as up to 10 dominant and codominant mast producing hardwoods. Oak and hickories are desirable leave trees within the stand, most likely as dominant or codominant canopy trees. Hardwood trees retained during thinnings will likely survive fire as these trees are generally too large in diameter to be affected by fire. Also, fires that are allowed to back into transition zones generally lose intensity quickly, minimizing impact to hardwood trees in those zones.
2. The hardwood resource is of prime concern to managers, particularly stringers, transitions zones, and other special areas. As stated earlier, backing fires are primarily used when prescribed burning, generally losing intensity, thus minimizing impacts to hardwoods in those areas. These areas, and other critical areas, may be plowed out at the manager's discretion. One concern with plowing out these areas is the accumulation of fuels in those sites, creating a potential for a hazardous fire situation that may have severe impacts to the hardwood resource if ignited. Well managed prescribed burning will have minimal impacts in these areas.
3. Having 75% of the historical range of the RCW for each National Forest in the HMA ensures that a large portion of the most suitable or once suitable habitat is within the HMA. If RCW once occurred there, suitable habitat was present. It is recognized that some marginal habitats will be within the boundaries of the HMA, but generally these areas will not be suitable for RCW and do not count toward the suitable acres within the HMA. For recovery of the RCW to occur the most suitable habitat will be managed. It is too costly and prohibitive to manage marginal areas for RCW.
4. There will flexibility to exceed these percentages to accelerate restoration of desirable pine species and to treat damaged or understocked stands. Regeneration can occur on a site specific basis as mentioned above. Although much of the Francis Marion National

Mr. Joseph M. Dabney  
Page 2  
March 21, 1994

Squirrel, White-tailed Deer and many nongame birds. A reduction in this component would negatively impact populations of these species. We feel it is not necessary to completely eliminate all dogwoods, oaks, hickories, and other hardwoods in cluster sites, and we would like some assurances for hardwood management considerations in the plan.

Specifically we believe the Forest Service should:

1. Reduce the following management constraints under MIL 1 as long as the population is stable or increasing. Increase regeneration options to include clearcutting. Increase allowance of midstory hardwoods within clusters, replacement, and recruitment stands to 6 stems per acre as long as they occur more than 50 feet from a cavity tree. Include oaks and hickories as desirable leave trees within these stands where allowed under all MIL's. Under MIL 1, reduce restrictions on thinning of foraging habitat and allow quality hardwoods that occur in foraging habitat to be protected from fire, especially in transition zones between upland sites and hardwood bottoms.
2. Protect hardwood areas from fire by establishing firelines as much as practical and requiring managers to consider hardwood areas, particularly transition zones, stringers and bottoms when burning without firelines.
3. Remove the restriction at the top of pg. 43 that requires a forest include at least 75% of the RCW's historic range in an HMA in order to be classified as MIL 1. Each individual forest should base its HMA on soil and habitat types, property boundaries, and geographic location of these types and boundaries rather than an arbitrary figure of 75% of the possible available habitat. The RCW HMAs should be located on the highest quality habitats in the best locations. Designation of marginal habitats like wet mixed stands as HMA's should not be required for a forest to reach MIL 1.
4. Allow flexibility for managers to exceed the 8.3 percent of pine in the 0-10 yr. age class and 25 percent in the 0-30 yr. age class restrictions and continue to regenerate in the case of natural events. Hurricane Hugo has created a large percentage of timber in the 0-10 yr. age class on the Francis Marion National Forest that will preclude any regeneration until 30 years after the storm. Some regeneration work will need to be done on the forest to benefit RCW's and other wildlife species.

Forest is in the 0-10 year age class, there is a large percentage in the 0-30 year age class as a result of past timber management which may be available for limited regeneration sooner than 30 years, given the criteria are met for regeneration.

5. The wet loblolly types on the Francis Marion National Forest within the HMA will not be managed for RCW unless currently occupied. Although the HMA acres are approximately 160,000 acres, only 120,000 acres within those acres are suitable for RCW. Managing the wet loblolly types would be cost prohibitive and self defeating for the reasons you mention.
6. The proposed alternative sets minimum size for clusters, recruitment stands, and replacement stands as 10 acres. This is the area where the most intensive management will occur for midstory control. The proposed alternative emphasizes but does not require the control of midstory outside of the cluster. Control of the midstory outside of the cluster will be primarily through prescribed burning. Stand boundaries are in part dictated by the landscape and condition of the stand. Arbitrary boundaries of 15 acres for these stands would not be practical, and as stated above, the most intense midstory control would occur in the cluster itself.
7. The Francis Marion National Forest is currently near a recovered level as defined in the DEIS. Annual monitoring will continue to provide information on the population size and trend. This population will be evaluated annually to determine if reclassification is warranted. Although the population currently depends heavily on artificial cavities, reclassification to MIL 1 is not precluded by this fact.


5. Reduce the proposed HMA on the Francis Marion National Forest to 120,000. The proposed 161,883 ac. HMA is unrealistic since about 40,000 acres of this figure is considered "wet loblolly", a community of transition areas between uplands and bottomlands. This community, a mix of pine and hardwood vegetation, is important for migratory songbirds, Swallow-tailed Kites, turkeys, and many other species that are not necessary part of a fire climax system. We believe that trying to manage this habitat for RCW's would be self-defeating because of the constant battle with both hardwood encroachment and the many RCW competitors that use this habitat such as Pileated and Red-bellied Woodpeckers and flying squirrels. We hope that the Forest Service can attain their ambitious goal of 800 RCW clusters through intensive management of the uplands.
6. There should be a maximum size set for clusters, recruitment and replacement stands of 15 acres. This will reduce the impact of intensive midstory control outside of current and probable cluster sites. This will also reduce the workload of the field staff and concentrate efforts on the most important areas of the stand. It is our understanding that designating replacement and recruitment stands has not been successful in increasing RCW populations. We question the value of their inclusion in this DEIS. If they are retained as management practices, a 15 ac. size limit for cluster sites, replacement stands, and recruitment stands would be more efficient as well as allow less impact on the hardwood component.
7. Classify the Francis Marion National Forest as MIL 1 when it has met the population goals with the understanding that some artificial cavity work will be required for several years. This population has made a tremendous recovery since Hurricane Hugo, due largely to Forest Service efforts. Restricting it to MIL 2 status based on tree size alone will restrict management practices unnecessarily with little benefit to the RCW population. Data from the Francis Marion has shown this population to be productive in much shorter rotations and less compatible timber management regimes than recommended under MIL 1.



Mr. Joseph M. Dabney  
Page 4  
March 21, 1994

We hope these comments are helpful. We appreciate the opportunity to comment on this DEIS. If you have any questions or if we can help you in any way, please do not hesitate to contact me or any member of my staff.

Sincerely,



W. Brock Conrad, Jr., Director  
Wildlife & Freshwater Fisheries

WBC:kd  
cc:James Timmerman, Jr.  
David Wilson  
Oscar Stewart  
John Frampton  
Tom Kohisaat



Band CN 173  
3/28/94

## Quachita National Forest Timber Purchasers Group

March 22, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
USDA Forest Service  
1720 Peachtree Road, NW  
Atlanta, GA 30367-9102

Dear Mr. Dabney:

The Ouachita National Forest Timber Purchasers Group appreciates the opportunity to comment on the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region.

Our recommendations are designed to increase the flexibility available to the individual forests. We urge you to make it clear that the FEIS provides only broad guidelines whereas the site-specific decisions on the management of the RCW must be made at the forest level through forest plan revisions. We believe Alternative E, if properly modified, can provide workable guidelines for use by Forest Supervisors when revising forest plans to facilitate the recovery of the RCW on Forest Service managed lands in the South.

After reading the DEIS, we conclude that the proposed action would devote 68,521 acres of the Ouachita National Forest to RCW management. The 1992 population was 16 active clusters. The long term population objective is 228. The rotation length is 120 years with regeneration cuts limited to "irregular shelterwood" cuts of 25 acres or less with a residual basal area of 40 square feet or more. The midstory vegetation will be controlled or eliminated in RCW clusters, replacement, and recruitment stands and reduced over the remainder of the HMA. South-wide more than 2,000,000 acres are proposed for inclusion in HMAs.

While there is frequent mention of ecosystem management (EM) throughout the DEIS, this proposal appears to be merely a preservation plan for a single species that encompasses nearly half the acreage of the pine and pine-hardwood types in the South. The statement does not even go so far as to articulate a desired forest condition (DFC) for the 2,000,000 acre proposal. It simply emphasizes the preservation of a single species rather than taking the ecosystem approach which focuses on "maintaining or enhancing the natural processes" that make up the ecosystem(s).

There is no apparent attempt to mitigate the adverse biological, social, or economic impacts from this proposal. The impacts are generally dismissed as minimal from a regional perspective without attempting to quantify on a local basis. In recent years, we have seen this approach erode the national timber sale program from 10-12 billion board feet annually down to slightly more than 4 billion in 1994. We have seen the Region 8 program drop from 1.2

P.O. Box 400

Russellville, AR 72801

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Response to Comments in Letter No. 191

From: James Bibler, Ouachita National Forest Timber Purchasers Group

Comment No.

Response

1. The management direction for the Red-cockaded Woodpecker (RCW) that is to be established by this FEIS is intended to revise the Regional Wildlife Habitat Management Handbook, amend the Southern Regional Guide and eventually become incorporated into affected Forest Plans. Regional direction for the management of the RCW is intended to be programmatic. It is meant to provide and maintain uniformity of implementation regionwide. The preferred alternative does allow flexibility in many of the management practices and tools that may be appropriate for a given situation. Additionally, the FEIS recognizes that there may be site-specific situations where this direction may require modification. Modifications to this direction is allowed at the Forest and site level with concurrence of the U.S. Fish and Wildlife Service.
2. Comment noted. There are many plant and animal communities associated with the same fire dependent ecosystems which supported healthy RCW populations. Current information indicates that, like the RCW, many of the species associated with these communities are also in decline. Because the establishment of relatively large Habitat Management Areas (HMA) provides consistent forest management at the landscape scale, these plant and animal communities will also benefit from this approach.
3. Chapter 3 of the FEIS discusses the economic affects of each of the described alternatives on the 72 counties and parishes within the National Forests with RCW. From these 72, it further identified four counties and one parish as being most dependent on National Forest timber for additional analysis. Economic impacts will be incurred in areas dependent on timber-related jobs and income and reliant on payments to the counties. However, the degree of impact will decrease with time as stands currently in the 0-30 age class grow older. The selected alternative also provides opportunities to lessen the short-term impact through pine restoration and use of the sub-HMA strategy. This will allow the forest manager to move towards a balanced age class distribution which will be beneficial to the RCW in the long-term by ensuring a sustained flow of RCW habitat while providing income to rural communities.
4. Each individual National Forest will have to assess the effects of the final RCW management strategy on its particular Forest

4 billion to 800 million board feet. Since 1990, the Ouachita has developed a cumulative ASQ shortfall of nearly 70 million board feet. These cut backs in sale programs on federal lands will cause North America to become a net lumber importer in 1994. The U.S. can no longer meet its demand for lumber by importing more from Canada. In recent months, the stumpage shortage has driven lumber prices to all time highs. The results are a major increase in cost of housing and the active substitution of environmentally unfriendly nonrenewable materials such as steel framing and plastic siding for wood. A quick look at growth versus harvest figures for the Southern National forests, shows that only a portion of the growth is actually offered for sale each year. The remainder is left to die, fall down, and rot. Why doesn't the agency enhance the health of the forests by using a portion of this excess growth and mitigate the social and economic impacts of programs such as the RCW rather than allowing the sale programs to slowly dry up?

5 It seems to us that the proposed 20% reduction in harvest levels (Table 3-12) is sufficient justification for a major revision of the forest plans rather than just amendments. The President's Forest Plan for the Pacific Northwest includes many mitigation measures to reduce the social and economic impacts caused by the withdrawal of "old growth" forests. Why doesn't this DEIS also use the same approach? Maybe its time for the agency to get serious about EM!

6 The following comments and suggestions are offered in the hopes of strengthening the FEIS.

7 Ecosystem Management. We believe the agency should embrace EM as the framework for restoring the RCW in the South. The first step is the development of a DFC which emphasizes the maintenance of natural processes and systems including the woodpecker. It must also recognize that biological systems are dynamic and include ecosystem health, productivity, and the human dimension.

8 Habitat Management Areas. Where populations of existing birds are low; the acreage set aside as habitat management areas (HMA) seems excessive. For example, on the Ouachita more than 4,000 acres are set aside for each of 16 clusters. On the Chickasawhay Ranger District in Mississippi more than 100,000 acres are set aside for four clusters.

9 Extended rotations, replacement stands, recruitment stands, 6 potential cavity trees per acre, and 25-40 BA of pine in "irregular shelterwood" stands would seem to provide more than adequate mature trees for cavity excavation.

10 The foraging habitat requirements of 6,350 pine stems per active cluster seems excessive based on recent events on the Francis Marion and the Apalachicola. A mechanism should be incorporated into the FEIS which permits using adaptive management as learning takes place and new science is developed.

11 Silviculture The DEIS proposes the use of "irregular shelterwood" techniques as the silvicultural method of choice for regenerating stands in HMAs with populations of RCWs that

Land and Resource Management Plan. The decision as to how (i.e. revision, significant amendment, or non-significant amendment) the Regional RCW direction is fully incorporated into a Forest plan will be dependent upon the magnitude of those effects.

5. Desired Future Conditions (DFC) statements are most appropriate at the National Forest and Management Area levels. While the DEIS emphasizes the use of natural processes, such as fire, and the restoration of natural communities preferred by the RCW, it will be up to the individual Forests to incorporate these concepts at the local level by way of a well thought out DFC.

6. The tentative RCW Habitat Management Areas (HMA) described in Appendix D of the FEIS are generally based upon the distribution of RCW cluster sites known to occur in 1986. They provide an area committed to the long-term management and recovery of the RCW. Healthy RCW populations require relatively large contiguous blocks of suitable habitat to ensure proper spatial arrangement of RCW groups. Large HMAs provide connected habitat for isolated subpopulations.

The U.S. Fish and Wildlife Service Red-cockaded Woodpecker (RCW) Recovery Plan identifies 15 RCW populations over the bird's range that must attain long-term viability in order for this species to be removed from the Endangered Species list. One of the areas identified to meet this RCW Recovery Plan objective is the Chickasawhay Ranger District in Mississippi. In the absence of population-specific reproductive data, 500 active clusters will be needed to provide the required minimum of 250 reproducing RCW groups necessary to maintain long-term viability. To support a population of this size requires approximately 100,000 acres.

7. The lack of potential cavity trees is considered to be a primary limiting factor in the recovery of the RCW. The selected alternative in the FEIS proposes to lengthen the rotations, provide recruitment and replacement stands and maintain some level of residual trees in stands to be regenerated in order to meet this critical need.

8. The foraging criteria for RCW incorporated into the FEIS were developed by the U.S. Fish and Wildlife Service in 1989. They are based upon three studies conducted on RCW populations in South Carolina. These criteria were developed to cover the entire range of the RCW. The selected alternative encourages individual Forests to pursue studies in consultation with the U.S. Fish and Wildlife Service which may establish new foraging requirements for specific areas/populations.

9. Comment noted. The FEIS recognizes that irregular shelterwood is an untested regeneration method for loblolly, shortleaf and slash pine. It also states that it is uncertain whether or not this method will supply a steady flow of RCW habitat. Depending on the site, the seedling densities may vary from very high to low under this silvicultural method. This like all other activities

are at "severe" or "extreme" risk. The leaving of 25-40 square feet of basal area will likely lead to poor regeneration and slow growth rates. The removal of all seedtrees except 6 relicts per acre may lead to a heavy mid-story and wind throws or lightning struck trees which would jeopardize any users. This untested silvicultural system needs further review before tying the RCWs future so directly to it.

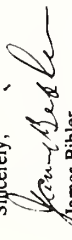
The rotation lengths in the DEIS may be needed with the untested "irregular shelterwood" system, but such rotation lengths are unnecessary if other forms of even-aged management are used. The use of appropriate silviculture will decrease the time required to develop sufficient heartwood or foraging habitat.

**Private Lands.** RCW management on agency lands has the potential to increase management responsibilities for the RCW on adjacent owners. If there is insufficient foraging habitat on agency lands, artificial cavities placed in pines within one-half mile of private lands can impact private land management. As RCW populations increase on agency land there is the possibility they will spill over onto adjacent landowners.

The agency should not install artificial cavities within three-quarters mile of private property without the landowners written permission. The FEIS must address the need for individual forests to consider the impact of their RCW management on private lands.

**Implementability.** Do you now have the financial and human resources needed to implement the proposed recovery program for the RCW? Alternative E with a estimated cost of more than \$14,000,000 per year represents about 10 percent of the agency's current budget in the South. We seriously question if you can dedicate that large a percentage of your budget to one species and continue to practice balanced multiple-use. What about sufficient manpower who can pass the "step test" to burn 500,000 acres annually recognizing that there are only a limited number of burning days available each year? Are you prepared to use massive amounts of herbicides to kill the large material now occupying the mid-story in many of these stands? Your track record for mid-story control under the 1985 RCW guidelines raises serious questions about the implementability of this proposal.

Sincerely,

  
James Bibler  
Chairman

cc: Senator Bumpers ✓  
Senator Pryor ✓  
Congressman Dickey ✓  
Congressman Hutchinson ✓  
Congressman Thornton ✓  
Congresswoman Lambert ✓  
Forest Supervisor Mike Curran ✓

prescribed in the final RCW management direction will have to be monitored to determine their efficacy towards producing the desired vegetation results.

10. The extended rotation lengths established in the FEIS will not only provide the necessary heartwood but also increase the incidence of red heart crucial to nesting habitat.
11. Comment noted. The placement of artificial cavities and the translocation of RCWs will be determined by the proximity to existing RCW groups, the availability of existing foraging habitat, and other site-specific situations. The distance to private land would be an issue which may best be addressed at the local level during the public involvement process at the project implementation stage.
12. Comment noted. The use of prescribed fire is essential to maintaining RCW habitat by controlling the woody midstory and improving the herbaceous understory. There are many plant and animal communities associated with the same fire dependent ecosystems which supported healthy RCW populations. Because the establishment of relatively large Habitat Management Areas (HMA) provides consistent forest management at the landscape scale, these plant and animal communities will also benefit from this approach. Funding for prescribed burning activities is expected from a combination of appropriated and K-V related sources. The frequency and season of prescribed fire as described in the FEIS is generally expected to control competing woody species. Where this does not occur, the use of herbicides may be used under certain circumstances and restrictions. Site-specific information will dictate which technique(s) will be most successful.





## Orleans Audubon Society

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

March 24, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Road NW, Room 718N  
Atlanta, GA 30367-9102

Via Federal Express

Re: Comments of the Orleans Audubon Society to the Draft  
Environmental Impact Statement for the Management of  
the Red-cockaded Woodpecker and its Habitat on National  
Forests in the Southern Region

Dear Mr. Dabney:

The Orleans Audubon Societies, a chapter of the National Audubon Society, submit the following comments to the Draft Environmental Impact Statement (DEIS) for the Management of the Red-cockaded Woodpecker (RCW) and its Habitat on National Forests in the Southern Region. Please reply to the undersigned at 734 East Rutland Street, Covington, LA 70433.

The situation of the RCW is one of ongoing crisis, wrought by past logging abuses and continued despite FS management efforts since the bird's listing under the Endangered Species Act in 1970. Much of the historic range has been forever altered for agriculture and human inhabitation. Existing laws are inadequate to prevent further loss of suitable habitat on private lands within the RCW's historic range; as more of the demand for timber is satisfied from private holdings in the southern U.S., we can expect a concurrent decline in RCW habitat and numbers. If healthy populations are to be recovered throughout the historic range, it will be on extensive tracts of Forest Service (FS) lands restored to the conditions under which the RCW evolved.

The Draft Environmental Impact Statement (DEIS) makes several strides toward improving on past management practices: natural regeneration, longer growing length, and more burning, including growing season burning. Its stated objective is to "restore the habitat under which the RCW evolved." It contains ambitious RCW population objectives. However, the DEIS continues the FS emphasis on commodity production. It provides minimal rather than optimal

Response to Comments in Letter No. 194

From: Frank LeBlanc, Orleans Audubon Society

Comment No. Response

1. Comment noted.
2. Comment noted.
3. The lack of potential cavity trees is considered to be a primary limiting factor in the recovery of the Red-cockaded woodpecker (RCW). In order to meet this critical need, the selected lengthens the rotations, provides recruitment and replacement stands and maintains some level of residual trees in stands to be regenerated. The extended rotation lengths established in this alternative will not only provide the necessary heartwood but also increase the incidence of red heart crucial to nesting habitat. Thus, the production and protection of old trees will occur as stands (i.e. cluster sites, recruitment stands and replacement stands) and as scattered trees within stands.
4. As stated above, the lack of potential cavity trees and existing cavities is recognized as a limiting factor in maintaining and improving the viability of RCW populations. The time and energy required to excavate a new cavity can be significant. The use of cavity restrictors and artificial cavities is necessary to provide sufficient suitable cavities until suitable cavity trees occur naturally through the avenues described above. The Forest Service and the U.S. Fish and Wildlife Service agree that the translocation of RCW from one location to another is critical to the viability and eventual recovery of existing small populations. All of these measures are needed to address critical habitat deficiencies in the relative short-term. The long-term management of RCW habitat in the selected alternative of the FEIS relies on extended rotation lengths, prescribed fire, minimal fragmentation and protection of the old tree component while emphasizing restoration of the pine communities preferred by the RCW.
5. The successful regeneration and establishment of pine stands is essential to providing RCW habitat in the long-term. This cannot be assured in Alternative D. The amount of RCW habitat regeneration that can occur within the Habitat Management Area (HMA) varies by alternative and is predominantly limited by the rotation lengths. Alternative D does allow regeneration for the purposes of restoring desirable pine types, such as longleaf. Current forest conditions will vary from HMA to HMA. Depending on the amount of "off-site" pines that are present in an individual HMA, the acres of restoration allowed during a ten year period may be greater under Alternative D than Alternative E for the first 10-50 years. The selected alternative provides the best balance of RCW habitat protection and maintenance while allowing incentives and flexibility for restoration.

resources for the RCW, and compromises the opportunity for recovery of self-sufficient RCW populations and the southern pine forest ecosystem in which it evolved. Specifically, the DEIS:

- (1) provides insufficient protection for old trees,
- (2) promotes overmanagement, including excessive emphasis on artificial cavities, and
- (3) allows excessive timber cutting.

#### Inadequate Protection of Old Trees

The preferred alternative cannot provide an adequate supply of new cavity trees because it allows cutting before trees are suitable to become cavity trees. For example, the stated "rotation age" for longleaf pine is 120 years. (Table 2-E7) Red heart fungus is typically found in longleaf pine over 100 years old. (Scientific Summary on the Red-cockaded Woodpecker, DEIS Appendix G, page 431) Thus, few if any trees are likely to live long enough to provide good cavity sites. Target age conditions recommended for longleaf pine are 100-250 years. (Appendix G, page 432) Natural RCW nesting sites will continue to decline, leaving the RCW further from self-sufficiency. Survival of the species will continue to depend on active management beyond a controlled burn program.

Older pines should be retained until the regeneration cycle of the southern pine forest ecosystem is restored in its historic range throughout FS lands, and enough suitable cavity trees are available for the RCW to establish self-sufficient populations. In the short term, thinning to reduce hardwoods in young pine stands is an acceptable ecosystem restoration practice. The preferred alternative, however, promotes destructive 2-aged management that retains few old trees and advances commodity production to the detriment of ecosystem restoration.

#### Overmanagement

Artificial cavities and restrictors, and translocation, have helped the RCW survive the present crisis. Artificial nesting sites and assisted migration are no substitute for a restored southern pine forest ecosystem. The Scientific Summit found that ecosystem management, characterized by growing season fire and lengthened rotations are crucial to the long-term survival of the RCW. (Appendix G, page 436) RCW populations dependant on artificial cavities and restrictors are not self-sufficient, and therefore are not "recovered." These efforts also do nothing to advance recovery of the other regional PETS species associated with RCW habitat, such as the gopher tortoise and the species associated with gopher tortoise burrows.

As long as the southern pine forests are managed for commodity



production, the RCW will be in crisis. The ecosystem in which it evolved will exist only in artificially designated plots, each a sort of wildlife park relying on heavy human intervention. The best conditions for the RCW and the ecosystem are sacrificed for the benefit of commodity production. In relying on intensive management efforts, the preferred alternative reflects an underlying resistance to management based on a recovered ecosystem.

#### Excessive Cutting

The DEIS makes it plain that the FS wants to sell more timber from the Habitat Management Areas (HMAs) than would be best for the RCW, by proposing a regime of Management Intensity Levels (MILs). There is virtually no reduction in the allowable sale quantities from present management in the tentative HMAs. (Table S-3) The excessive timber cutting that brought about the present crisis continues under the preferred alternative.

Alternative D purports to address the effect of commercial logging on the RCW. It eliminates sustained yield in HMAs, emphasizes restoration of habitat through natural seeding, and provides for prescribed burning and thinning for habitat restoration. Alternative D is more likely than the preferred Alternative E to restore the HMAs to the southern pine forest ecosystem in which the RCW evolved, yet still envisions about 75% of baseline timber harvest levels, and considerable employment opportunities, income levels, and payments to local counties and parishes. Alternative D should be considered a starting point for management of the southern FS holdings from an ecosystem restoration rather than commodity production perspective.

#### Conclusion

The DEIS should be amended to protect older trees as the southern pine forest ecosystem is restored through prescribed fire and natural regeneration. Artificial means of nesting assistance and population dispersal should continue until the ecosystem is restored throughout its historic range on FS lands. Any timber harvest should be limited to limited thinning and cutting to restore desirable species.

Very truly yours,

ORLEANS AUDUBON SOCIETY



Frank V. LeBlanc III  
Vice-president

Dear Folks!

After careful consideration of the draft environmental impact statement for the row I have several concerns that I feel are not adequately addressed.

The first of these concerns is related to the rotation age of the pines in the clusters and in the foraging habitat. In the paper "Cavity tree selection by the redcockaded woodpeckers in relation to tree age" by Rudolph and Conner, the authors stated that all the research done so far is biased. The fact that there are virtually no forests composed of trees older than 70 - 100 years precludes us from making decisions about the row habits and well being in old growth forests. Extrapolation of trends in all other papers about the row as well as historical records point to a more stable and more prolific population in the older stands of pine. The selection of the rotation ages in all alternatives except D are blatant concessions to timber industries and do not take the best interests of the birds into consideration. Certainly the row will survive with this heavy handed management approach but it will not prosper. The approach Harris took in "The fragmented forest" is an excellent way of producing timber and providing habitat for species that need the mature forests. This draft approximates this theory well but is missing the key ingredient, old growth forest. Finally I feel that the draft does not supply an option that adequately addresses the conclusions that can be drawn from the papers it is based on, in other words the rotation ages are too short.

The second concern I have is that nowhere in the draft is there an adequate discussion of the amount of hardwood component in the foraging area. In the red cockaded woodpecker recovery plan it is clear that the row is not adversely affected by hardwood components up to 49%. The problem I perceive here is the creation of a habitat that will only suit the row and a few other species. The exclusive pine habitat excludes many other species native to our forests and will as a consequence force them onto the endangered species list. You may argue, quoting many papers on time spent by the row foraging in pines, that the row feeds almost exclusively in pines and therefore we should provide that habitat. But these studies are flawed because they are missing a crucial step. They are not studying the amount or the kind of food taken in but simply the time spent looking for food in an environment. The unspoken conclusion that the row has the best success in obtaining food in pines is not adequately linked to the time spent in pines. The birds may get 90% of their sustenance in 10% of their time in the hardwoods and then spend 90% of their foraging time in pines looking for truffles for desert. I am not saying that this is the case. I am simply saying that none of the scientific data adequately addresses this issue and that basing the management strategy of the row on these weak conclusions is not smart for the

Response to Comments in Letter No. 195

From: Jörg Freiberger

Comment No. Response

1. The USDA Forest Service agrees that the 70-80 year rotation of timber is unsuitable for RCW population expansion and recovery. The proposal, depending on the pine species, calls for a 70-120 year rotation and agrees the 70 (proposed for Virginia pine which does not grow in Texas) to 100 year rotations are not old enough to provide habitat for RCW. The pine species common to Texas (such as shortleaf and longleaf pine) will be managed for 120 year rotations, while loblolly (which is highly susceptible to SPB epidemics) will be managed in Texas on an 80 year rotation. The concept of old growth allocations within RCW HMA's was not developed in this EIS and will be dealt with in specific forest plans such as the recently released DEIS and Plan for NFOT.
2. The direction in the proposed alternative allows up to 3 midstory hardwoods per acre in the RCW Cluster (28 and 175) and up to 10 overstory dominant or codominant hardwood trees per acre. Areas in the HMA but outside clusters will experience some reduction in midstory hardwoods but there is no established restrictions on the number or quantity of codominant or dominant hardwoods. This is far from a perception of HMA's comprised exclusively of pine. The amount of hardwood species and management allowed will be provided by ecologically based management that provides adequate habitat best suited for this site and RCW. The specific determination on a particular forest will be further defined in Forest Plans and projects tiered to these plans and the proposed EIS.
3. The proposed action does not preclude essential RCW cluster wilderness areas, but emphasizes management to provide suitable habitat outside the wilderness areas. Alternative E considers most wilderness RCW groups nonessential to recovery and would not control SPB to protect the RCW groups in wilderness in most situations. Since wilderness RCW groups would in most cases be considered nonessential for recovery, southern pine beetle control would not be initiated to protect those non-essential wilderness RCW groups or their foraging habitat. However, southern pine beetle control may in some cases be initiated within wilderness to protect essential RCW groups (this may also apply to actions that would protect habitat which is immediately adjacent to or within 1/4 mile of the wilderness boundary). Foraging habitat that occurs in wilderness will not be protected (31).

birds survival. A minor component of the birds diet that comes from the hardwood component may be critical to their well being. So i suggest that for both the row and other species that are dependant on hardwoods for their survival, the plan should included a definitely stated mature hardwood component of no less than 39% no greater than 49% per stand where such an environment would have occurred normally.

The third concern that i have is that the draft makes no proposal to stop cutting for spb in wilderness areas where row are present. Folks this is a wilderness area, it will maintain itself, that is what it's there for. I would like to see the eis for the spb reopened to address this issue

Finally i would like to say that i see many more problems, but these three are the main ones. As none of the alternatives address any of these adequately i would have to say that alternative D is the best choice and that your preferred alternative is most definately not satisfactory.



Jorg Freiberg  
1316 Willard  
Houston  
Texas 77006

P.S. A box of this letter should have arrived  
at your office on the 25th of March.

Received 3/25/94  
RCW

(176)

1120 West College Ave.  
Wiggins, MS 38577  
3/21/94

Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm 78N  
Atlanta, GA 30367

Following are my comments on the RCW EIS.  
I am going to comment as the EIS Summary  
applies to the ~~Desoto~~ Desoto NF and then  
general comments.

#### Comments Applicable to Desoto

It is survive for the FS to propose  
setting aside 15,1254 acres on the Desoto  
for HMTs. I understand that at the present  
~~that~~ time there are no active colonies on the  
Black Cr. R.D., 4 active colonies on the  
Biloxi R.D., and 2 or 3 active colonies  
on the Chick R.D. It would seem that the  
FS could recognize that the RCW is beyond  
recovery on the Desoto, Trans located,  
augmentation is marginally successful! With  
a timid species such as the RCW, the  
large number of predators that the bird  
has to contend with, its slow reproduction  
rate and short life expectancy there  
is no hope for recovery! The FS

Response to Comments in Letter No. 196

From: Joe D. Duckworth

Comment No. Response

1. The USDA Forest Service believes that recovery is possible on the Desoto National Forest because there is presently suitable habitat and potential suitable habitat for the RCW. Because there are low numbers of active groups presently occupying the forest does not mean recovery can not be attained. Small populations of RCW have expanded very successfully as a result of translocation and the use of artificial cavities. Intensively managing the existing clusters would not contribute toward recovery and genetic viability of the population.
2. There will no doubt be economic impacts to local communities as a result of the implementation of this proposal. However, the degree of impacts will decrease with time as the stands in the 0-10 year age class become older. There are also opportunities for timber harvest through thinning, even-aged management, and uneven-aged management to develop suitable RCW habitat and attain a balanced age class distribution ensuring a sustained flow of RCW habitat and providing income to rural areas.
3. General Comments: Over time the USDA Forest Service has gained knowledge about the status of the RCW and habitat requirements of the RCW. It is now time to use this knowledge to fulfill our responsibilities under the Endangered Species Act and recover this species, allowing less restrictive timber management in the future.



should recognize and admit this fact.

The few remaining RCWs on the Desoto should be transferred to other NF system lands where there is a larger population, or intensive habitat management for the existing RCWs on the Desoto. Only adequate acreage to support the existing active population and any expansion should be set aside for intensive RCW habitat management.

Setting aside 151,254 acres on the Desoto in ATMs is going to have a drastic effect on timber sales (jobs), other wildlife species and 25 per cent returns to the counties. For years the counties did not receive 25% returns equal to taxes paid by private landowners. Now when the returns should be increasing due to the sell of more sawtimber at a higher price the FS proposes to cut the county's throat with no justifiable reason. This is grossly unfair!!

#### General Comments

Some districts in the Region have been criticized for lack of initiative and emphasis on RCW habitat management. In my opinion the districts have done a good job managing RCWs considering



the leadership shown by the Regional Office Wildlife Section and funds provided to the districts. During 15 1/2 years (1977-92) on a district that had RCWs we had one visit from RO WL Biologists assessing the RCW situation. One FY the district received only \$250.00 for RCW habitat work. Only in the last few years has the FS really known how many RCWs they had on districts or whether holes in pine trees were occupied by RCWs. To determine the population required much work by District WL Biologists to climb trees and examine cavities, observe sites early in the morning and late in the afternoon to see if RCWs were actually present.

Sincerely,  
Joe D. Duckworth



MEVIN G. PARKER  
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Baton Rouge, LA

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Re RCW 3/27/94  
(177)

## THE LOUISIANA FORESTRY ASSOCIATION

TELEPHONE (318) 443-2555 • P.O. DRAWER 5067 • ALEXANDRIA, LOUISIANA 71307-5067

March 21, 1994

Mr. Joe Dabney  
RCW EIS Team Leader  
U.S. Forest Service, Room 718N  
1720 Peachtree Rd., NW  
Atlanta, GA 30367-9102

Dear Joe,

The Louisiana Forestry Association (LFA) appreciates the opportunity to respond to the Draft Environmental Impact Statement for Management of the Red Cockaded Woodpecker (RCW) and its Habitat on National Forests in the Southern Region (RCW EIS).

Table 5-6 in the Summary RCW EIS shows an increase in payments to counties (parishes) over the baseline period 1988-1989. This is misleading to the communities and families dependent on Federal timber for their livelihoods. This Table should be redone using current timber volume and price levels. Even with the rising prices, the drastic curtailment of timber harvest due to the RCW EIS will mean less revenue to local government. To illustrate, the following table was produced from a recent press release from the U.S. Forest Service, *Kisatchie National Forest 2-94*, showing what's actually happening.

### KISATCHIE NATIONAL FOREST PAYMENTS TO PARISHES\*

	1992	1993	\$
PARISH			
Claiborne	\$128,733	\$ 79,925	— \$48,808
Grant	926,880	574,978	— 351,902
Natchitoches	830,296	516,408	— 313,888
Rapides	657,607	410,791	— 246,816
Vernon	550,425	341,770	— 208,655
Webster	79,190	49,167	— 30,023
Winn	715,555	444,308	— 271,247
TOTAL	\$3,888,688	\$2,417,348	— \$1,471,340

\*numbers have been rounded to the nearest dollar

Response to Comments in Letter No. 197

From: C.A. Vandersteen, Louisiana Forestry Association

Comment No.

Response

1. Comment noted. The table you refer to (S-6) in the Draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker (RCW) and its Habitat on the National Forests in the Southern Region (DEIS) has been changed in the FEIS. All comparisons in the revised table will be based upon 1994 price levels.
2. Comment noted.
3. The lack of potential cavity trees is considered to be a primary limiting factor in the recovery of the RCW. The extended rotation lengths established in the selected alternative are intended to not only provide the necessary heartwood but also increase the incidence of red heart crucial to nesting habitat. Off-site loblolly pine occurring on areas which were historically occupied by longleaf or other pines are often subjected to greater risks of Southern Pine Beetle (SPB) outbreaks. The selected alternative in the FEIS encourages the restoration of these species back to the areas they historically occupied. The preferred alternative also establishes an 80 year rotation for loblolly pine on those landscapes where it historically occurred and where the risk to SPB is high.
4. Comment noted. The use of prescribed fire is essential to maintaining RCW habitat by controlling the woody midstory and improving the herbaceous understory. Funding for prescribed burning activities is expected from a combination of appropriated and K-V related sources. Where this does not occur, the use of herbicides may be used under certain circumstances and restrictions. Site-specific information will dictate which technique(s) will be most successful.  
  
According to figures provided by the Kisatchie National Forest, approximately 70,000 acres were burned in 1991 and reported in their 1992 Annual Report. The 25,000 acres you refer to is that portion of the total amount accomplished for fuels improvement. The balance of the acres burned were for wildlife habitat improvement, threatened and endangered species habitat management, and range forage improvement. The Kisatchie has maintained this prescribed burning acreage for the past five years.
5. Comment noted. The placement of artificial cavities and the translocation of RCWs will be based on the proximity to existing

2) With such an abundant timber resource on Federal land and the critical contribution this makes to manufacturing jobs in timber dependent communities, the RCW EIS has not struck a balance between endangered species and people's needs. In fact, you are creating animosity toward the RCW and making it a liability for all landowners and timber workers.

There are several ways to reduce this liability in addition to the economic consideration mentioned earlier:

3) The rotation age for loblolly pine in the RCW EIS is 100 years. Knowing the high incidence of Southern Pine Beetle (SPB) infestation that occurs in Louisiana, this rotation age is excessive and jeopardizes the recovery of the RCW and exposes private lands to a greater risk of SPB outbreaks. Hooper et al (1991) in his study of cavity trees recommended rotations for loblolly as young as 75 years which are more acceptable to the Louisiana Forestry Association.

4) The Kisatchie National Forest (KNF) is expected to burn 72,000 acres each year for the RCW. The 1992 KNF Annual Report showed only 25,000 acres burned across the entire forest. How can the number of acres triple at current funding levels of the KNF? These additional costs are added to a dwindling timber sale program creating more "below-cost" criticism ~~against the KNF~~ and ~~less revenues to local~~ government.

5) The private landowner is concerned that the KNF's RCW EIS will tie his lands into the recovery process if the Forest Service establishes cluster sites near the common boundary. To alleviate this concern the US Forest Service should establish clusters no closer than 3/4 mile from private property.

6) The LFA believes the Forest Service should follow its final RCW guidelines on all Federal land, including Wilderness areas. The Wilderness area in Louisiana is primarily Longleaf and theoretically ideal habitat for RCW. Why should forest lands used for commercial purposes have to carry the full load of RCW management? There is no scientific reason for the Forest Service to manage RCW less intensively on Wilderness than on other lands if the recovery of the RCW is the primary objective.

7) The Forest Service should clearly state that judicious application of clearcutting is compatible with the maintenance and growth of RCW populations. Clearcutting

RCW groups, the availability of existing foraging habitat, and other site-specific situations. The distance to private land would be an issue which may best be addressed at the local level during the public involvement process at the project implementation stage.

6. The FEIS process for delineating the HMA boundary excludes wilderness which does not allow essential management practices, such as prescribed burning and midstory control, to occur. However, the preferred alternative encourages all Forests having RCW groups within a wilderness, especially those which are predominantly longleaf pine, to develop wilderness plans which allow these management practices.

7. Comment noted. The selected alternative of the FEIS allows for both even-age and uneven-age management to occur within RCW Habitat Management Area (HMA). Depending on the Management Intensity Level and the desired future condition of a particular HMA, a variety of regeneration harvest cutting methods are also available. The extent of a particular silvicultural system and the availability and amount of a particular harvest cutting method will be determined at the Forest and site levels based upon the needs of the RCW, the local issues and objectives, and other site characteristics.

The use of clearcutting as a regeneration harvest method continues to be an issue at the national, regional and local levels. In most cases, the use of the seed-tree or shelterwood harvest methods will ensure the regeneration of the future stand while maintaining some level of RCW habitat capability. While the use of clearcutting is reduced in most of the alternatives described in the FEIS; with the exception of Alternative D, it is still allowed under certain circumstances such as pine restoration and damaged or understocked stands.

8. The management direction for the RCW that is to be established by this FEIS is intended to revise the Regional Wildlife Habitat Management Handbook, amend the Southern Regional Guide and eventually become incorporated into affected Forest Plans. Regional direction for the management of the RCW is intended to be programmatic. It is meant to provide and maintain uniformity of implementation regionwide. The preferred alternative does allow flexibility in many of the management practices and tools that may be appropriate for a given situation. Additionally, the selected alternative recognizes that there may be site-specific situations where this direction may require modification. Modifications to this direction is allowed at the Forest and site level with concurrence of the U.S. Fish and Wildlife Service.

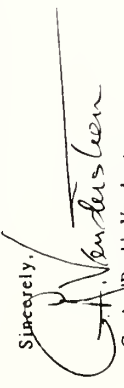
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is a useful management tool consistent with a landowner's desire to accomplish forestry and wildlife objectives. In no way should the Forest Service diminish this proven management option.

The Louisiana Forestry Association would want the RCW EIS to give as much flexibility to the local professional land managers of the KNF and the users of the KNF. LFA sees Forest Service decisions being made more at a Regional or National level without due consideration for the people at the local level. This concerns us greatly and is indicative of a growing alienation of local interest with public policy decisions.

Thank you for the opportunity to comment on the RCW EIS and please call if you have any questions.

Sincerely,

  
C. A. 'Buck' Vandersteen  
Executive Director

CAV/and

cc: Senator Johnston  
Senator Breaux  
Congressman Fields  
Congressman Livingston  
Congressman Jefferson  
Congressman Tauzin  
Congressman McCrery  
Congressman Baker  
Congressman Hayes





## TEXAS

**PARKS AND WILDLIFE DEPARTMENT**  
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March 25, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd., NW, Rm 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

This is a letter of response to the "Draft Environmental Impact Statement for the Management of the Red-Cockaded Woodpecker and its Habitat on National Forests in the Southern Region" (EIS). The Department appreciates the opportunity to review the Draft, and has the following comments to make concerning its implementation.

The idea of establishing large, contiguous habitat management areas (HMA's) as RCW management zones is a very sound one, and is an excellent approach to ecosystem management. The extensive acreages involved in creating these HMA's will be extremely beneficial to the woodpecker by eliminating currently fragmented habitat prevalent throughout the National Forests in Texas. Due to the diversity of land use by private landowners in Texas, managing large continuous blocks of land on an ecosystem basis is virtually impossible on private lands; therefore, it is very important to establish these areas where the land base is available. In addition to enhancing the demographics of RCW populations, using prescribed fire as an integral tool in managing the HMA's will help to restore the open, grassy pine community type once typical of portions of east Texas.

Use of growing season burns to re-establish and maintain open pine savannas will be beneficial not only for the maintenance of prime RCW habitat, but to many other animal and plant species as well. For instance, several federally listed species could possibly benefit from growing season burns. Examples of listed and candidate species associated with frequently burned

Response to Comments in Letter No. 192

From: Texas Parks and Wildlife Department

Comment No.

Response

1. Comment noted.

2. Prescribed fire is a major component in the management of all pine dominated uplands in the south; it is a benchmark tool proposed in the DEIS. Growing season fire is emphasized, but it would be inappropriate to mandate its use in all situations without programmatic (Forest Plan), and site specific (prescribed burning plan and/or project) analysis of each site proposal for prescription burning. Forest Plan Goals and Objectives and the Management Area Desired Future Condition establish a framework for site-specific activities such as restoration, timing of prescribed fire, and vegetation management.

Site specific projects are a detailed, extrapolation of Forest Plan objectives with specificity such as description of prescribed fire needs for that site and the amount of growing season burning. Promoting growing season fires or restoration on all ecologically similar areas is appropriate in programmatic direction; mandating these techniques in EVERY situation has been found to be unwise. Specific direction should be reserved for each site decisions due to confounding situations such as USFS ownership patterns (incompatible neighboring land), differing site characteristics (excessive fuel loads) or other problems that make that management application undesirable.

3. Management intensity level also involves a monitoring effort that will trigger changes in RCW management direction if downward trends in a population are documented.

4. Rotations are proposed in the DEIS that best provide habitat conditions for RCW. These rotations are based on the best science known about each specific pine species. This document promotes the sound use of both EAM and UEM techniques. Forest Plan and project level decisions as described previously (Response 2 above) will further define the techniques used on a particular forest or site. Site-specific conditions will dictate the use of all silvicultural techniques through time. Careful analysis of roads and other impacts will also be made during site-specific management planning.

5. In shelterwood methods of regeneration the stand is removed in 2 or 3 cuttings prior to rotation age. This EIS proposes to ensure these removals are late in the rotation cycle (not prior to 10-20 years of rotation age). If the irregular shelterwood method is utilized 25-40 basal area will be left on site after the final regeneration cut, ensuring a substantial number of dominant trees to persist on site well past rotation age (61-63).



Mr. Joseph Dabney  
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open pine savannas of Texas include the endangered Texas trailing phlox (*Phlox nivalis* var. *texensis*), the Louisiana pine snake (*Pituophis melanoleucus ruthveni*), Bachman's sparrow (*Ammodramus heslowii*), Houston toad (*Bufo houstonensis*), and numerous other plant and animal species. Rigorous burning programs, especially during the growing season, are long overdue in Texas. A few concerns expressed by Department biologists related to the proposed burning program are:

- 1) In order to best manage for RCW and the species associated with its habitat, burning should be required--not simply emphasized. If a window is left open for other options, the burning may not be done as often or as intensively as necessary. When restoring the forbaceous layer, winter burns are not as effective as growing season burns and may result in a waste of time and money.
- 2) Although the idea of burning one-half million acres a year is appealing to our Department, some concern has been expressed as to whether current funding levels of the USFS are sufficient to achieve this goal.
- 3) Support from upper USFS management and the ability to utilize more local weather information will be important factors in making future burns much more effective than in the past.

In terms of the actual proposed alternatives, TPWD believes that alternatives C, D, and E will offer the best opportunities to recover the woodpecker and other species associated with its habitat. The establishment of large HMAs, increased rotation ages for potential cavity trees, and return of fire to the ecosystem are major contributing factors to the possible success of the proposed alternatives. Creating management intensity levels (MILs) from which to measure the success and subsequent management actions of RCW HMAs is an excellent idea. The MILs and associated actions are clearly defined and offer no chance for misunderstanding or confusion. The only concern pertaining to MILs is the potential loss of birds in shift from MIL 3 management into MIL 4 management. For example, active clusters can drop from 499 (MIL 3) to 99 (MIL 4) before the MIL management change occurs. Perhaps a change in management strategy should occur before such a significant number of clusters are lost.

6. Thinning and active stand management will promote healthier stands resistant to SPB. In some situations even this management effort has not been completely successful, prompting the promotion of reduced rotation lengths to ensure a continual flow of RCW habitat.

The Department realizes that in some cases, uneven-age management may be one of the best regeneration techniques for enhancing forest biodiversity; however, there are some strong concerns that uneven-aged management may not be the best way to manage for RCW habitat in all forest types. First of all, the frequent entries that will be made into individual stands will result in the development of extensive road systems and considerable site disturbance. Secondly, use of fire will be limited, except in longleaf pine stands, due to the relatively continuous pine regeneration. Without a rigorous burning schedule, midstory control will need to be achieved through artificial means by use of herbicides and mechanical control. These activities would not be conducive to sound ecosystem management.

Department biologists favor the irregular shelterwood regeneration option in Texas loblolly stands. This technique offers several advantages for creating optimal RCW habitat. The retention of some or all residual trees will allow for very old trees to occur throughout the management areas. If these trees were to survive two rotations and then be designated as priority leave trees for the next rotation, they could potentially reach maximum age. This offers an advantage over uneven-age management, which generally uses diameter limitation to determine length of rotation. As a result, the potential for trees to reach maximum age is greatly reduced. Another advantage to irregular shelterwood is that midstory control can be achieved through prescribed fire due to young regeneration only being present for a small portion of the rotation. Use of prescribed fire will not only be beneficial to RCW habitat, but many of the other threatened, endangered, or candidate fire climax species that occur in these ecosystems. Finally, human impact and possible predation can be reduced with irregular shelterwood due to fewer entries and roads into the management areas.

In terms of rotation age, the Department questions why regeneration cuts occur within 10-20 years of rotation age, instead of at full rotation. This seems contradictory to producing older trees for use as potential cavity trees. Will the older one third of the stand ever be allowed to reach full rotation? This should be clarified in the revised EIS. A second concern is the proposal to shorten rotation lengths under Alternative E in high southern pine beetle (SPB) risk areas. Since Texas forests as a whole have experienced extensive SPB problems, this may result in less management for older RCW stands in Texas. The Department would encourage the Forest Service to rely more heavily on stand thinning to reduce SPB risk rather than reducing rotation length.

Mr. Joseph Dabney  
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Overall, the Texas Parks and Wildlife Department believes that the Draft EIS is basically a sound management directive for RCW management on the National Forests of Texas. We appreciate the approach of the document. If you want to clarify any of our concerns, please contact Melissa Parker, endangered species biologist, at the following location:

Texas Parks & Wildlife Department  
P.O. Box 4655  
S.F.A. Station  
Nacogdoches, TX 75962  
(409) 560-6863

Sincerely,



Larry D. McKinney, Ph.D.  
Director, Resource Protection Division

AS:MMP:cg

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Re RCW  
3/25/94

Comments on :

Draft Environmental Impact Statement for the Management of  
the Red-cockaded Woodpecker and Its Habitat on National  
Forests in the Southern Region

From:

Frances C. James  
Department of Biological Science  
Florida State University  
Tallahassee, FL 32306-2043

To:

Joe Dabney, RCW EIS Team Leader  
USDA Forest Service  
1720 Peachtree Road NW (718N)  
Atlanta, GA 30367

Date:

23 March 1994

Response to Comments in Letter No. 199

From: Frances C. James

Comment No. Response

1. - 12. Many comments were noted, most of which supported the commentor's opinion that the preferred alternative was not the best way to recover the RCW. The commentor mentions many specific points which led her to her conclusion. The selected alternative would not allow timber harvest, cutting, or killing of trees within clusters, recruitment stands, and replacement stands except where those actions would protect or improve RCW habitat. The Forest Service, through research of its own, literature search, coordination with the US Fish and Wildlife Service, and in light of a non-jeopardy biological opinion rendered by the US Fish and Wildlife Service, has concluded that the probability of recovery of the RCW is very good under the selected alternative.
13. The Final EIS Selected alternative contains a requirement of 30 years for the minimum age of foraging habitat. This is a change from that in the DEIS.
14. See Letter #119, Response to Comment #15.
15. See Letter #36, Response to Comment #1.
16. Evaluation of other alternatives noted.

### Introduction

The status of the Red-cockaded Woodpecker (RCW) is one of real crisis (Appendix G of the EIS). In a survey of the status of the species in 1986, Costa and Escano (1989) found that, in spite of a major conservation effort, sixty-seven per cent of populations on national forests were declining. James (in press a) found a 25% range-wide decline in the number of known active clusters (sites that support at most one pair of birds and a few helpers) in the 1980s.

The stated objectives of the proposed new regional direction for RCW management are to "restore the habitat conditions under which the RCW evolved" and to permit recovery of the species according to the criteria in the 1985 Recovery Plan as modified by the Scientific Summit (Appendix G). In spite of evidence that (1) cavity trees are becoming unsuitable faster than they are being replaced and (2) burning regimes have been inadequate to maintain good habitat, the recent success of translocation of birds and the use of artificial cavities has led to optimism about the possibility of stabilizing declines and getting populations to increase. I think the priorities should be:

1. Provision of excellent habitat and potential cavity trees in the shortest possible time, using a landscape approach. Active clusters, inactive clusters, and sufficient replacement and recruitment stands must be managed to provide optimal nesting habitat for the full population objective (tentatively 9300 clusters).
2. Protection of present resources
3. The use of restrictors, artificial cavities and translocation to improve the resources of existing clusters and to encourage the formation of new pairs of birds in potential cluster sites.

For achievement of objective 1, the preferred Alternative E would use Habitat Management Areas (HMA's), areas that could potentially support recovery populations and subpopulations (as opposed to management by individual territories). To achieve objective 2, Alternative E would set criteria for burning regimes and timber harvest according to Management Intensity Levels (MIL's). To achieve objective 3, Alternative E would



encourage an expanded program of use of (1) restrictors around cavity entrances, (2) drilled cavities and inserts, and (3) translocation. Administratively the new policy involves revising the Regional Handbook and the Southern Regional Guide and amending 11 forest plans to set up tentative Habitat Management Areas that include sets of 3/4-mile circles around active and inactive clusters. Formal revisions of each forest plan would follow within three years.

The conditions in the Apalachicola Ranger District (ARD) of the Apalachicola National Forest (ANF) and in the Red Hills Plantations in southwestern Georgia and perhaps in the Vernon District of the Kisatchie National Forest are the best presently available for the RCW. The habitat of the Red Hills population most closely mimics the habitat under which the RCW evolved. It is managed not on any rotation, but by single-tree selection. The ARD and Vernon Districts have been managed in the past by clearcutting and site preparation with exceptionally good protection for older trees and vigorous burning programs.

Because the Chief of the Forest Service has decreed that there shall be less clearcutting, managers are now required to emphasize alternative methods. This EIS responds to that pressure to find more ecologically sound methods of tree harvest by advocating two-aged methods and uneven-aged methods, giving the local manager substantial flexibility to select a method viewed as appropriate for local situations.

The best way to provide what healthy populations need is to provide them with at least the level of resources available to the three most healthy populations. Even so, the two large and apparently healthy populations on national forests (Apalachicola Ranger District and possibly the Vernon Ranger District) are not known to be increasing at a rate that portends reaching their tentative population objectives (Table S-1) within the next 100 years. Even though the ARD population may be declared to have recovered (250 breeding groups and stable), its resources will have to be improved if the FS is serious about reaching the stated population objectives. Other than the three RCW populations mentioned above, the populations that are either stable or increasing rely on artificial cavities, so what their status would be without such management is unknown.

All timber harvest in each HMA should be designed to improve its habitat until populations are self-sustaining and population objectives are reached, that is, until they are not artificially supported with restrictors and artificial cavities. During this period of improvement of resources, management can benefit from artificial cavities and translocation. However,

population increases due to artificial cavities should not be used as a criterion for estimation of the health of a population and its management intensity level. The differential use of Management Intensity Levels in the EIS is an unnecessary compromise with timber objectives that will interfere with recovery of the species. I object to the lax policy of management with MIL 1 for the ARD. Also, the ARD population, which is large and at least stable, should not be subjected to a program of interference with its cavities or translocation within its population. Its management should emphasize finding more efficient ways to improve its habitat further so that it can increase to the point of its population objective naturally.

The ideal way to improve RCW habitat through management is:

1. To replace off-site pine species with the appropriate species, usually longleaf pine.
2. To thin overstocked young pine plantations. To preserve all other pines until population objectives are reached.
3. To carry out a vigorous burning program that emphasizes burning the entire acreage every three years and puts priority on growing-season burns.

Because the Forest Service wants to harvest more timber from the HMA's than would be harvested in the ideal situation, as described above, the EIS proposes a complicated regime of Management Intensity Levels that allow harvest that is not ideal for the RCW. The EIS allows substantial additional thinning of stands plus a rotation schedule, based primarily on two-aged management and specifying what must be retained. These are compromise measures that will interfere with recovery of the RCW, making it take longer than it would take without them. Management in tentative HMA's, which is likely to be followed for the next three years, is changed so little from present management (same allowable sale quantity) that the HMA's are unlikely to be of much benefit to the RCW until new forest plans are developed. Too much flexibility is given to individual managers in the formulation of the proposed new individual forest plans; they have too much opportunity to continue the past policy of overharvesting the timber. Because of the uncertainties involved in the proposed scheme, each forest should be required to set up a scheme of alternative management strategies so that the effects of two-aged management and uneven-aged management can be compared.

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The EIS advocates several ecologically sound standards and guidelines that are bound to improve conditions for the RCW over past practices. Examples are emphasis on natural regeneration rather than site preparation, longer rotation, more burning generally, and more growing-season burning. However, the reluctance of the Forest Service to think about timber harvest except in terms of stands and rotations, or burning except on a regular schedule, or providing optimal rather than minimal resources for endangered species is an example of its basic reactionary commodity-based outlook. Faced with the loud and clear message that the public wants healthy forests, the agency is still compromising that health by allowing too much timber to be harvested to allow the forests to develop optimally. This EIS advocates the next most damaging type of timber harvest to clearcutting (two-aged management in which site-preparation is allowed and in which retention of old trees is minimal). While inching toward more sound ecological practices, the agency, rather than showing leadership, is showing reluctance to change.

#### The Proposed Alternative

The proposed alternative has the following standards and guidelines:

Foraging habitat for each cluster would have at least 6350 pine trees at least 10 inches in diameter that are at least 25 years old within 1/2 mile and connected to each cluster (regardless of how many acres are needed to provide it). Regeneration would be by two-aged and uneven-aged management, emphasizing two-aged management. The oldest 1/3 of the habitat in a 3/4 mile circle would be held until it is within 10-20 years of rotation age; the minimum rotation length is 70-120 years, depending on the species of pine; there would be no even-aged management within 1/4 mile of a cluster (or 3/4 mile?). Burning 490,000 acres each year will produce a 4-year burning regime. With four Management Intensity Levels, seed trees can be removed in MIL 1, and substantial thinning would be allowed. If subHMA's are designated, the areas between them can have a less intense management level than the rest of the HMA.

#### Evaluation of the Preferred Alternative

RCW populations will always need management, at least in the form of a controlled burning program, and there is no reason why timber harvest can't also be part of the management of RCW habitat. How well does the

preferred alternative in the EIS satisfy its stated objectives? The first comment is that the EIS does not state the estimated level of uncertainty about recovery associated with the alternative. In spite of its good features, I judge that the probability of recovery of the RCW with Alternative E is very low. Because of the scientific uncertainty associated with the alternative, the final EIS and others (see James, in press b, attached) should employ an experimental and adaptive approach to management (Walters 1986). The pilot research projects advocated by the Scientific Summit, are not part of the EIS. Had a technical advisory committee been used to help formulate the EIS, I expect the recommended strategy would have been very different. The EIS procedure has become a substitute for the preparation of a new recovery plan, but it is an in-house Forest Service document that compromises recovery objectives with timber harvest objectives much too much. Realistic projections of expected responses to the alternative, ones that can be checked by monitoring, should be part of the program.

#### 1. Scientific uncertainty and the need for experiments

Because of the high level of scientific uncertainty about what level of resources will be required to get RCW populations to the stage in which the populations are independent of management and are increasing, experiments are needed. Past practices have not been successful. Artificial cavities are useful for artificially increasing a population over what its resources allow naturally, but we need to know how to provide the resources that the RCW needs to maintain itself independently of artificial cavities. Experiments are needed to allow comparisons of the effects on resource levels for RCW's of:

- (a) Uneven-aged management vs. two-aged management for provision of the best foraging habitat. Farrer and Boyer have shown that the BDQ method (no stands and no rotations) is the proven forest management practice that most closely fits the objectives above. Why is the Forest Service so reluctant to even try it?
- (b) Burning on a regular basis plus massive burning early in most years vs. burning on a regular basis alone. Burning before seeds hit the ground may be very important to natural regeneration of longleaf pine, and emphasis on burning in



certain years could make a huge difference in levels of sprouting and seedling establishment.

(c) Natural regeneration after burning vs. site preparation and planting seedlings.

(d) Comparative observational studies (those that use principles of experimental design to guide timing of observations) are needed on the long-term effectiveness of artificial cavities (drilled cavities vs. inserts vs. natural cavities) and restrictors (metal plates to keep other species out of cavities). The long-term effectiveness of artificial cavities is not assured. Restrictors are unlikely to keep out flying squirrels or Red-bellied Woodpeckers. Resin flow in trees with artificial cavities may be insufficient, etc.

## 2. Insufficiency of acreage to be burned

The objective should be to burn the entire 2-million-acre area of the HMA's every three years (one third of it every year). The preferred alternative calls for 490,000 acres to be burned per year, not 666,000 acres. The burning program needs to have a much higher priority in most of the 11 forests than it has had in the past. Last year the Apalachicola National Forest burned 30,000 acres. Why is fire listed as a nonsignificant issue on p. 22?

## 3. Insufficient protection for old trees, too much thinning, insufficient "rotation length," need to stop plowing the land

a. The Scientific Summit concluded that RCW habitat should provide trees 80 to 250 years old. The present death rate of cavity trees is judged to be 1-5% per year. How will an adequate number of new cavity trees be supplied under the preferred alternative, when it preserves relics but harvests trees before they become suitable to be cavity trees?

All harvest in HMA's should be beneficial to the RCW. Pines more than 40 years old should be retained until the forest attains its natural regeneration cycle and the RCW makes new cavities in trees at a rate that will sustain the population. Thinning is acceptable in young stands and to reduce hardwoods. Retention of hardwoods is not beneficial to the RCW. The shelterwood

and seed-tree harvest advocated in the EIS are not beneficial to the RCW.

- b. According to the Scientific Summit (Appendix G, p. 433), recommended target ages for cavity trees in longleaf pine are 100-250+ years; for shortleaf 80-150; for loblolly 80-120. The EIS (p. 12) says 80 years is old enough in longleaf and that "as populations increase, options to provide future cavity trees could be reduced". In the Apalachicola National Forest longleaf pine is now in approximately an 85-year rotation. Changing that to 100-120 will not be sufficient to make a big difference to the RCW in longleaf. Similarly a 100-year rotation is not sufficient for loblolly and slash pine, especially with the allowance to cut within 10-20 years of rotation age.
- c. According to figures given by Ron Escano at the Tall Timbers Conference on The Longleaf Pine Ecosystem in 1990, red-heart fungus enters longleaf pine at 100 years on good sites, earlier on poor sites. Under the recommended alternative (E), longleaf timber can be harvested within 20 years of the stated rotation age, which is 100 years. The de facto rotation age is therefore 100 years, and no trees on good sites are likely to be suitable as future cavity trees. Overall, if rotation ages are absolutely necessary, they should be much higher than those in Alternative E.
- d. Management Intensity Levels (MIL's) are unnecessary. All areas should have the maximum protection. Twenty-three per cent of the acreage and 52% (1031) of the active clusters in the tentative HMA's are in two forests (Francis Marion and Apalachicola). These important populations should not receive less attention than small populations.
- e. The statement on page 181 that "thinning older stands with scattered relicts will increase their suitability as nesting habitat" is not true. These areas have been thinned too much already. See also page 38, which allows thinning of relict and potential cavity trees if they are "overly dense."
- f. Site preparation damages the soil and water regime (p. 23), so it must not be permitted.

#### 4. Overemphasis on artificial cavities

Artificial cavities are designed to help managers get a population through a bottleneck period while new cavity trees are being provided. If the population increases, even to 500 groups, but is dependent on artificial cavities, it is not self-sufficient and should not be considered to have recovered. Management must assure a continuous supply of new nesting and foraging habitat new habitat. That provision is inadequate in the EIS.

Jeff Walters' work shows that drilled cavities are preferable to inserts (see also p. 44 of the EIS), so they should be used instead of inserts.

#### 5. Lack of a schedule for evaluation of progress, unrealistic population objectives, and difficulties with estimating the health of a population.

a. The monitoring program needs refinement. How will five-year averages for trends be calculated in populations that are sampled only every other year? If specified objectives are not achieved within a certain period, additional protection should be called for automatically.

b. The designation of recovery populations needs reevaluation, even if only within the Forest Service. The Chickasawhay Ranger District is expected to increase from four to over 500 active clusters? The Talladega/Shoal Creek RD will go from five to over 400, but the Wakulla RD, which had 182 active clusters in 1992, has been dropped as recovery population? Actually the Forest Service's 1994 estimate for the WRD is 140 active clusters (Charles Hess, personal communication).

c. Past monitoring has been insufficient. Costa and Escano (1989) judged the Wakulla Ranger District of the ANF to be stable and suitable as a source of young female birds for translocation, but James (1991) showed that in 1990 an estimated 32% of its defended clusters were defended by single birds. The rate of cavity turnover was

significantly higher in the WRD than in the ARD in 1991 and 1992 (James et al., in press). Estimates of these variables (proportion of clusters occupied by single birds, annual rate of cavity turnover) are not difficult to get and are important indicators of the status of a population. These papers and the only recent paper summarizing the status of the RCW rangewide (James, in press a) are not cited in the EIS.

The difficulty of judging the health of a population that is dependent on artificial cavities will be a serious problem. The EIS implies that populations artificially bouyed up by artificial cavities will be considered to be less at risk. If they reach 250 pairs will they be judged to have recovered?

6. Alternative E, the preferred alternative, is too much of a compromise with timber interests. It promotes overmanagement with regard to artificial cavities and restrictors; it allows too much harvest of timber; it allows removal of some relict trees, and it is unlikely to provide any new self-sustaining ecosystems, even in the long run. The EIS puts insufficient emphasis on ecologically sound ways to restore the ecosystem and to promote self-sufficiency in RCW populations.

The strategy should be (1) to protect all current clusters in these 11 forests, even those that would encompass less than 10,000 acres; (2) to work especially hard to get inactive sites reactivated; (3) to work to get the area of HMA's inside and outside present 3/4-mile circles at least to the same level of resources as those of the healthiest populations (either Apalachicola Ranger District or Red Hills Plantations). Under Alternative E, this objective could never be achieved; many loopholes allow managers to continue policies damaging to the RCW:

- a. Tentative HMA's allow current levels of harvest (allowable sale quantity) beyond the 3/4-mile circles, and they will probably be in effect for the next three years (p. 162).
- b. Even the most stringent MIL (4) allows 25-acre areas to be plowed and site-prepared under six trees per acre, a very ecologically damaging policy.



- c. The MIL for an HMA can be lowered on the basis of responses to provision of artificial cavities, even though the other resources may not have improved.
- d. The healthiest population (ARD) will receive the least attention and the least restrictive management, even though it is the source of most birds for translocation. It should be the model for the other populations and we should know more about it. Under Alternative E, there could be treatments in 40-acre patches! The Scientific Summit recommended a maximum of 10-acre patches.
- e. The designation of subHMA's, another option available to managers, allows more harvest of timber in an HMA between its subHMA's than does the MIL for the overall HMA. This provision is just a giveaway to timber interests and has no ecological justification. "Leaving more trees would slow the balanced age/size distribution" (p. 167) is a sentence that should be removed.

f. Lesser but important problems:

- (1) It would be a mistake to use artificial cavities in the Apalachicola Ranger District, as permitted under Alternative E. The ARD population is presently at least stable on its own.
- (2) Translocation can be useful, but it should not be justified by a need to maintain genetic diversity within or between populations of RCW's. According to research by Sue Haig and Peter Stangel, genetic diversity even among natural RCW populations is minimal. Apparently their isolation has not been going on long enough for them to be suffering any genetic problems from their isolation. Translocation to bring mates to single males can be important but is only justified if combined with a strong commitment to habitat improvement.

- (3) Provision of artificial cavities, up to 4 fourper cluster in all RCW clusters, and restrictors on all cavities, as recommended, is an example of overmanagement. Restrictors can keep Pileated Woodpeckers from enlarging cavities and should be used when there is evidence of problems with Pileated Woodpeckers. To my knowledge they do not keep out flying Squirrels or Red-bellied Woodpeckers. Artificial cavities should be used primarily to induce birds to establish new social units and then only in conjunction with habitat improvement. Increasing the size of social groups by provision of artificial cavities does not increase the number of breeding pairs, so it should have a low priority.

- (4) Why was the minimum age of foraging habitat lowered from 30 to 25 from 30 years in Alternative E?

- (5) Why wouldn't it be harmful to habitat to leave only six isolated trees per acre? If there are more than six potential cavity trees per acre, would all but six be taken? How would this help recovery?

- (6) What will happen to populations that do not have enough acreage to support a 50-group HMA, about seven average compartments?

#### Other Alternatives in the EIS

A--Keep interim guidelines, use a 120 year rotation, allow 1/3 of the pine and pine-hardwood to get within 10-20 years of rotation age; involves 1.4 million acres; 3 MIL's; uses irregular shelterwood method of harvest; artificial cavities to get four cavities per cluster, but optional in MIL 1; manage 3/4-mile circles; no removal of seed trees; burn 363,000 acres per year

B--1985 Recovery Plan with modifications, affects only 125,000 acres; manage clusters, replacement and recruitment stands intensively; winter burns of 32,000 acres (in clusters); standard seed-tree and shelterwood regeneration; uneven-aged methods allowed

#### C--Habitat management Areas and five Management Intensity Levels (MIL's), minimum rotation ages 70-200 years;

affects 2 million acres; emphasizes thinning; will produce suitable cavity trees in the shortest time; burning in entire HMA; growing-season burns; can remove seed trees in MIL 1; burn 490,000 acres per year (3/4-mile circle every 2-5 years); uneven-aged methods allowed

D--Keep interim guidelines within 3/4 mile of clusters, use thinning and natural seeding; HMA's of 2 million acres; no established rotation length; use present plans outside the 3/4-mile circle where two-aged and uneven-aged regeneration would be OK; would generate the least habitat? 5 MIL's; no removal of seed trees; burn 490,000 acres per year

#### Evaluation of the Other Alternatives

1. Alternative D is the most ecologically sound strategy for managing present habitat within 3/4-mile circles, and if its guidelines were applied throughout the HMA's, habitat improvement would be rapid. Even so, off-site pines would have to be replaced (probably by clearcutting), and substantial thinning would be helpful in young overstocked stands. There would be no rotation length, and many trees would be allowed to reach 200 years old. MIL's would not be needed.
2. Alternative C is the next most ecologically sound strategy, so long as thinning is conducted prudently. Its long rotations are very important. Some winter burning should be allowed, if it is necessary to knock back overgrown vegetation, but the emphasis on growing-season burns is good.
3. Alternatives A and B are no longer acceptable because they do not call for area-wide management. Their emphasis on seed-tree and shelterwood regeneration methods, even with retention of seed trees, is unlikely to produce healthy forests; even so, experimental pilot studies could demonstrate their potential, especially if combined with harvest and burning that is coordinated to take advantage of mast years, so that seedlings will become established readily without any site preparation.

# Literature Cited

- Costa, R. and R.E.F. Escano. 1989. Red-cockaded Woodpecker status and management in the Southern Region in 1986. U.S. Dept. of Agric. Forest Service, Southern Region, Tech. Publ. R8-TP12.
- James, F.C. 1991. Signs of trouble in the largest remaining population of Red-cockaded Woodpeckers. *The Auk* 108:419-423.
- James, F.C. (in press a) Status of the Red-cockaded Woodpecker in 1990 and the prospect for recovery. In D.L. Kulhavy, R.G. Hooper, and R. Costa (editors). Red-cockaded Woodpecker Symposium III: Species recovery, ecology, and management.
- James, F.C. (in press b) Joint ESA/AIBS review of President Clinton's plan for the management of forests in the Pacific Northwest. *Bull. of the Ecological Society of America*.
- James, F.C., Charles A. Hess, Gregory Hagan and Bowie Kortla (in press ) Population structure and annual turnover rates of cavities of the Red-cockaded Woodpecker in the Apalachicola National Forest. In D.L. Kulhavy, R.G. Hooper, and R. Costa (editors). Red-cockaded Woodpecker Symposium III: Species recovery, ecology, and management.
- Walters, C. 1986. Adaptive management of renewable resources. MacMillan, New York.



Received 3/25/94  
RCW 200

2616 Mtn. Brook Pkwy.  
Birmingham, Alabama 35223  
March 23, 1994

Mr. Joseph M. Dabney, RCW EIS Team Leader  
U. S. Forest Service  
1720 Peachtree Road, N.W., Room 718N  
Atlanta, Georgia 30367 - 9102

Dear Mr. Dabney:

We are pleased to comment on the Draft EIS for Red-cockaded Woodpecker (RCW) management in the Southeast National Forests and compliment the Forest Service on its efforts to establish a long-term recovery plan for this endangered species. This is especially because, until the current recovery strategy was begun, it does not appear that the woodpecker had been increasing anywhere except a few prime habitats at distant places in its historic range. We also note, at the outset, that management for the RCW is excellent management for high-grade timber and management against insect pests like the Southern Pine Beetle (SPB). Consequently, the management strategies set forth in the proposed action and most of the alternatives will work not only to benefit the endangered RCW but also timber management in the Southeast National Forests and could also be initiated on private or other government lands to obtain similar yields of high-grade timber and reduction of pine beetle infestations.

Some important elements common to all or most of the alternatives would appear, from their importance, to be worth emphasizing:

(a) Thinning of stands to reduce the risks of infestations of the SPB (referred to above) -- The 50-80 square feet of basal area per acre (BA) needed by the RCW is also known from experience to provide better management for merchantable timber as well as more healthy trees that are more resilient to such insect infestations. Professional foresters have advised that most soils found in Alabama will not support a good quality stand of pines if the stand is over 80 BA, and experience has shown that a stand with less BA offers greater protection against the SPB, which has a history of causing much expenditure of public and private funds that we should try to avoid.

At some places in the DEIS, a top BA of 100-110 is suggested (pgs. 51, 182), but experience has shown that such a high limit is too thick for the woodpecker, or for good timber management or for protection against the SPB. More groups have been lost from too thick a foraging habitat than loss of nest trees; thus, we strongly advocate use of 50-80 BA.

(b) Provision of adequate foraging habitat of trees 10" diameter, 30 years or older within 1/2 mile of and connected with RCW groups -- Experience has shown in the Southeast that the average foraging area for a clan or group is 200 acres, so this should provide adequate acreage (when allowance is made for some timber management). Please note also that the recommendation of the Summit Conference in 1990 (pg. 430) is that "to provide adequate habitat, 200 to 400 acres per clan should be available."

(c) Encouraging restoration of Longleaf Pine in areas where it historically occurred -- This was a fire-promoted historic ecosystem that we have seen greatly reduced, so it is a positive feature to restore it where it historically existed. Care, however, must be taken not to waste efforts to try to restore it on steep slopes in the more northern regions, particularly mountainous ones, or in streamside areas that should more appropriately be reserved for bottomland hardwoods. (We have had mentioned to us that an area in the northern part of the Talladega National Forest was clear-cut or otherwise cut for longleaf pines when it more appropriately should have been restocked in hardwoods, and hardwoods would, of course, be more appropriate in providing needed habitat for neotropical and mast-requiring species. Thus, we do urge that care be taken in avoiding areas that should best not be managed for pines.)

Response to Comments in Letter No. 200

From: Robert R. Reid, Jr.  
for himself, the Alabama Audubon Council, The Alabama Conservancy, and

Alabama Ornithological Society

Comment No.	Response
1.	Comment noted.
2.	See Letter #205, Response to Comments #2 and 5.
3.	Comment noted.
4.	Comment noted.
5.	Comment noted. See Letter #33, Response to Comment #7.
6.	Comment noted.
7.	Comment noted. See Letter #113, Response to Comment #7.
8.	See Letter #100, Response to Comment #6 and Letter #113, Response to Comment #5.
9.	See Letter #113, Response to Comment #7 and Letter #205, Response to Comment #5.
10.	Comment noted.
11.	Comment noted.
12.	Comment noted.
13.	Comment noted.
14.	Comment noted.

(d) Use of an ecosystem approach to protect the habitat of the RCW which, as the Draft EIS notes, was also habitat to many proposed endangered, threatened and sensitive species (animal and plant) found in similar habitat -- This is referred to as the "PETS" program and is a very positive feature of management for the RCW.

(e) Limiting "regeneration of the oldest 1/3 of pine and pine-hardwood acres until they are within 10-20 years of rotation age" so that suitable potential cavity trees will be ensured in the shortest time to replace those that will ultimately die out -- Looking toward recovery of the species, this provision should serve to keep a sufficient number of potential nesting trees in the RCW Habitat Management Zones (HMZs).

(f) Lastly, and one of the most important features, limiting the use of clear-cutting and substituting a type of irregular shelterwood and uneven-aged (single-tree or group selection) cutting, except where even-age management is used to restore longleaf pines on sites formerly occupied by them -- We would not, in this connection, recommend clear-cutting to establish any other pines (unless clear-cuts are required for their regeneration in the same manner as we understand they are for longleaf). We believe experience has shown that the most recent serious loss of the RCW has occurred with the advent of the South's "Third Forest" through extensive clear-cutting, which has eliminated preservation of older stands of pines. Consequently, it is most commendable that the direction for management will now be toward other types of regeneration more conducive both to preservation of nest trees and to an adequately thinned BA of foraging habitat.

We would, therefore, strongly advocate the proposed action (Alternative E) with modifications of (i) continuing the minimum age of foraging trees at 30 years as in Alternative A and as it is, we believe, under present management; (ii) limiting the criteria for damaged or "sparse" stands to 30 BA since stands of sufficient height above that BA can still serve to sustain the RCW; (iii) maintaining all stands at 80 BA or less; and (iv) assuring that any two-age shelterwood cuts retain, after the first cut, a BA near the lower range of the 50-80 BA preferred by the species. This last qualification would mean limiting the first cut to a BA of, for example, between 30-50 BA -- below 30 BA would appear much too thin for the species and too much resembling a clear-cut.

We have these following concerns that we hope the Forest Service will be able to implement in its final plan:

(1) Avoidance of Restriction of Range -- As you know, the 1985 Recovery Plan, which has not been successful in recovery of the species, proposes only to provide 15 separated populations of the RCW, most of which would be on national forest lands. That is a range contraction, and one we view as a serious one, especially when compared with maps showing the historic range of the species (see Fig. 1-1). That plan was criticized by the Committee on Conservation of the RCW of the American Ornithologists' Union in its 1986 report, as published in its scientific journal, *The Auk*, at page 851, stating:

The emphasis on 15 widely separated populations could increase the rate of disappearance of smaller, connection populations if individual forest managers infer that all other populations are not critical. This perception, together with the emphasis on timber production, may lead managers with small populations to minimize their responsibility to the bird.

We, therefore, strongly advocate that those national forests listed in Table S-1 (same as Table 2-E1), where there is a tentative HMA with a land base sufficient to support recovery of the bird, be listed as recovery populations. We strongly urge inclusion of the Ouachita National Forest in Arkansas, the Cataboula, Evangeline and Kisatchie Ranger Districts in Louisiana, the Homo-

chitto National Forest in Mississippi, and the other two national forests in Texas. All of these appear to have had good RCW habitat, are within its historic range, and appear to have sufficient available habitat where good pine management and RCW management might coincide to produce excellent RCW habitat. The old adage was "not to put all of one's eggs in one basket." Therefore, it would seem desirable -- and especially since it is good timber management and good management against insect pests -- not to put all of one's eggs in only 15 baskets when there are opportunities -- and it would appear readily available opportunities -- to have more!

In our own State of Alabama, we do have some concern about the number of groups anticipated for the Talladega National Forest that is in a mountainous region -- a southern extension of the Appalachians. Thus, we recommend reducing the number of groups planned for it since it is mountainous and has many streamside areas more adaptable to hardwoods or mixed stands with hardwoods predominating. In substitution for the Talladega groups, we urge increasing the number of groups planned for the Conecuh National Forest in the very south part of Alabama where there is excellent opportunity for longleaf and other pine habitat for the RCW and where it has historically inhabited that area.

In addition, could not the Service included recovery populations in the Uwharrie National Forest in North Carolina and the Sumter in South Carolina? The former is very close to the Pinehurst area where the RCW seems extremely adaptable to nesting in the roughs between the fairways of the Pinehurst golf courses, and the Sumter has similar good habitat at the Piedmont of South Carolina. Further, it would seem desirable to list the population at the Southeast tip of Oklahoma, which we note is a black-shaded area on the maps in this draft. The Service can doubtless find other good areas, which even if not supporting full HMAs, would permit RCW management for small populations, especially in the coastal plain, that would contribute to restoring the RCW's historic range can be restored.

(2) Types of Regeneration Cuts -- We note that the preferred and other alternatives are basically using two-stage shelterwood cuts or uneven-aged management. We compliment the Service on not using clear-cuts because such cuts fragment the foraging habitat and, hence, cause the bird to expend undue amounts of time and energy trying to obtain sufficient food (thus leaving less for breeding), interfere with the need for a habitat where males and females can forage at different levels as is their biological adaptation, and open the forest canopy to predators. Following these constraints, it would appear that the first stage of a shelterwood cut should not cut the area down to 20-30 BA, which we believe has been permitted in some cases. That is, of course, too low for the RCW (unless it has an enormous foraging area) and is almost equivalent to a clear-cut. Further, it is the biological fact that the females feed lower and on larger stems than do the males. Thus, their foraging habitat requirements need to be preserved, which is another reason for making sure there is an ample BA in older trees for the foraging habitat.

Seed-tree cuts are commendable in leaving candidate nesting trees on the site, but the remainder of the site would seem to have too little foraging area for the species -- it would appear that 10 stems is certainly not enough. On the other hand, we understand that a two-stage shelterwood cut is, in actuality, the first two stages of an otherwise three-stage cut. Under that practice, there should always be an adequate foraging area (as long as the third stage cut is not made). Consequently, it seems desirable to combine the two -- the aspects of a seed-tree cut to preserve nesting and potential nesting trees, with a shelterwood cut in stages sufficient that there will always be a foraging area with the needed 50-80 BA per acre. The seed-trees could presumably be handled on a long-rotation basis such as already has been prescribed by the RCW Extended Rotation Guide and with also the relic and other older trees saved.

Regarding the above, research has shown that pines (at least Loblolly and Shortleaf), with reasonable control of hardwood brush, do regenerate in stands with not over 75



BA. Such studies would indicate the Service should be able to have regeneration in desired stands of 50-80 BA, except probably in the case of Longleaf Pine.

Another option used in Alternative E and similar alternatives will be group selection, which we understand means that the forest managers will designate areas where it would be appropriate to select groups of trees to be cut. This will result in small open areas for regeneration and, since they would be of limited size, would be interspersed among stands of trees that would themselves contain adequate foraging areas and potential or actual nest trees to support the species. Consequently, group selection, shelterwood cutting (but not below 50 BA), and seed-tree cuts supplemented by leaving foraging trees, together with uneven-aged management, would be the prescribed regeneration cuts. This does require individualized appraisals by the forest managers; but they should know their forests well, and the benefits to the RCW as well as good timber management and pest control would seem worth the additional effort.

(3) Understory Management -- As you know, the Forest Service is participating with the U.S. Fish & Wildlife Service and other governmental and non-governmental agencies in the Neotropical Migrant Bird Conservation Program (commonly known as Partners-in-Flight) to find solutions to the significant declines in many neotropical migrants. You have properly noted, many of them use solely hardwoods for their breeding habitat. An accommodation is needed, and you have indicated the same in the reference to management for species needing mast production. Intensive thinning may be an overreaction to the past state of affairs where there was hardly any thinning at all (which, of course, was detrimental to the RCW). We understand that management is not intensive on the Bienville National Forest in Mississippi (as compared, for example, to that on the Noxubee National Wildlife Refuge). Experts have advised that some presence of hardwoods in an RCW colony is not detrimental and provides additional arthropod diversity and biomass that could enhance RCW food supply. Thus, the understory management should not be so intensive as to prohibit the existence of hardwoods but just to limit them sufficiently to allow the females still to feed by providing access to ample pine tree trunks having a dbh of 10" or more.

It might be necessary, for example, to cut down trees that normally grow very tall like oaks and hickories, but the Forest Service could leave dogwoods and various shrubbery that would be inhabited by species like the Kentucky Warbler, Black-and-White Warbler (although it nests on the ground, it needs hardwood cover as a protective understory). Swainson's Warbler (some nest in uplands in addition to bottomland hardwoods), Wood Pewee, and other understory and mid-story neotropical migrants. Such management might also save some expense by not requiring thinning so often. In addition, the controlled burns could still be in the summer and, as a result, would not have to be as frequent, thus saving costs, and would not prevent some growth of small trees and shrubs. We, therefore, are recommending, as an accommodation, a Bienville-type understory approach to this issue and its use on a large percentage of the HMAs.

(4) Modification of Damaged or Sparse Stands -- It appears that the Service will be eliminating or cutting such stands. However, those of sawtimber height from 66 BA upward do have a sufficient BA that should accommodate the RCW. Consequently, we strongly urge limiting damaged and sparse stands to those with less than 30 BA, saving all those above that amount. These thicker stands would also appear to have ample potential for high-yield pine management.

(5) Supplemental Recovery Practices -- Since the Service will be working toward recovery of an endangered species, it would seem that whatever supplemental recovery practices are available should be employed and become part of the recovery plans, such as:

(a) Corridor Management -- This is discussed in some detail, with references to successful use, in the AOU Report. There it focused on use of rights-of-way of interstate

of interstate highways and other roads as habitat corridors. The RCW apparently has no problem with roads or traffic, and the rights-of-way are usually managed to keep down underbrush as a part of highway maintenance. Thus, their use is very cost-effective. The RCW has nested along state and interstate highways in Alabama, so this is evidence that such a corridor network would be useful for recovery of the species. Further, the bird apparently does very well on golf courses like those at Pinehurst that have strips of pines between the fairways, which provides further evidence that corridor management is useful as providing not only connecting habitat but also even nesting sites. Since this method has already shown it will work, we strongly suggest that it be incorporated into the recovery management plans.

(b) Firewood Cutting -- Where consistent with understory management for neotropical migrants (see (3) above), this practice can be successfully used as a management tool as it was in the Noxubee Wildlife Refuge in Mississippi. The plan is to allow the public (without charge) to thin the pine stands by cutting of hardwood outside the RCW breeding season. This helps the Forest Service thin the stands, which needs to be done for recovery of the species and then, from an energy conservation point of view, puts the firewood to worthwhile use. In addition, it also provides favorable positive public relations for the Forest Service.

(c) Hardwood Strips in Pine Monocultures -- This is, of course, not a direct management tool for recovery of the RCW. However, since the adverse impacts from fighting SPBs are, from our experiences in Alabama, considerable when RCW colonies are involved, it is most desirable to take action to prevent such insect infestations.

Such management would be to interperse in the pine stands some hardwood lanes or strips so as to prevent spread of SPB or other insect infestations. Some have said that the SPB would have sufficient flying ability to move through open fire lanes -- but it is suggested that these not be open lanes but contain deciduous trees that are not host to the SPB. In addition, since the practice of fighting SPBs is to cut lanes similar to fire lanes around infestations, there must be some positive silvicultural benefits to be obtained from having a pine monoculture interspersed with some sort of lanes before the infestations occur. Consequently, we would recommend such a practice throughout the national forests, not just in the HMA's, since pest infestations can occur anywhere.

It is much more cost-effective to try to maintain good RCW and high-yield timber habitat than to recreate it after it has been lost. Therefore, this letter is submitted by the undersigned as an interested taxpayer and attorney and also in behalf of the Alabama Audubon Council, The Alabama Conservancy and Alabama Ornithological Society, which have an aggregate of around 10,000 members in Alabama and adjacent states and each of which organizations is very interested in preserving our natural resources, including the RCW and our timber resources. Because this letter recommends certain management practices that may well transcend the Southern Region, we are sending a copy to the Chief of the Service for his review. Your efforts in this matter are indeed to be commended, and your consideration of the foregoing factors will be greatly appreciated.

Sincerely yours,

*Robert R. Reid, Jr.*

Robert R. Reid, Jr., for himself, the Alabama Audubon Council, The Alabama Conservancy and Alabama Ornithological Society

RRR/rc  
cc: Chief, U.S. Forest Service  
Submitting organizations



Received 3/25/94  
RCW

201

## Southern Timber Purchasers Council

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March 24, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Rd. NW, Room 718 N  
Atlanta, GA. 30367-9102

Dear Mr. Dabney:

The Southern Timber Purchasers Council ("Council") appreciates this opportunity to respond to the Draft Environmental Impact Statement for Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region ("RCW DEIS"). The presentations you made in numerous states and the following question and answer period were helpful to further enhance our understanding of the DEIS. Thank you.

After careful review and discussions with members across the South, the Council provides the following detailed comments on the DEIS. Our position is that Alternative E requires modifications which respond to the need for site specific flexibility. This position focuses on the Draft EIS portion which recognize the potential for flexibility in applying management techniques, on a forest by forest level but lacks the direction to broaden flexibility by numerous management schemes (e.g. rotation length, foraging, etc.). While it is essential to take a regional look at the recovery management techniques for RCW, it must be emphasized that an across the board solution is not capable of responding to specific site conditions.

Without serious consideration and changes to the Final EIS to reflect the shortfalls of the DEIS; the agency's RCW Management Plan will be inadequate and open for appeal. We are convinced that recovery of the RCW can be accomplished, in the long term, with an even more site specific management approach as we suggest in these comments. Factors which should be considered at the forest level include (1) the importance of a particular RCW population to the overall survival of the RCW; (2) the RCW population trend in that forest; and (3) other local conditions. Amendments and revisions of forest plans can achieve this, if the regional guide (RCW Draft EIS) provides for sufficient flexibility.

### COSTS/ABILITY TO ACCOMPLISH GOALS

The Council is extremely concerned with the agency's ability to financially follow through on the RCW management plan as outlined in the DEIS. The estimated cost of the preferred alternative ("E") is identified at \$14.18 million per year for the first 10 years. First, the Council questions the adequacy of the identified cost. The DEIS does not provide a breakdown of the cost so it is difficult to determine if it is realistic.

Response to Comments in Letter No. 201

From: Southern Timber Purchasers Council  
signed by Deborah Baker

Comment No. Response

1. See Letter #143, Response to Comment #1 and Letter #149, Response to Comment #8.
2. See Letter #37, Response to Comment #6 and Letter #113, Response to Comment #3.
3. See Letter #149, Response to Comment #8.
4. See Letter #1, Response to Comment #8, Letter #150, Response to Comment #3, and Letter #162, Response to Comment #5.
5. See Letter #143, Response to Comment #2.
6. See Letter #33, Response to Comment #42.
7. Flexibility is built into the RCW recovery plan. See Letter #37, response to Comment #1.
8. See Letter #143, Response to Comment #3.
9. See Letter #160, Response to Comment #11 and Letter #205, Response to Comment #11.
10. See Letter #33, Response to Comment #50.
11. Comment noted.
12. The Forest Service establishes tentative population objectives in the EIS, and final objectives for each HWA in the forest planning process. Permanent population objectives are determined after the permanent HWA has been delineated in Forest plans and are based on the area of suitable RCW habitat. Appendix A of the EIS presents a detailed description of this process.
13. The foraging criteria are based on three studies conducted on the Francis Marion National Forest. The results are described in detail in the RCW Recovery Plan (USDI Fish and Wildlife Service 1985). The requirement for 6350 stems is based on reproductive output increasing as number of available pine stems increase up to 6350. This guideline was adopted in the RCW Recovery Plan to enhance recovery of populations. It does not represent the

Second, based on previous experiences, such as the inability to fulfill mid-story control as outlined in the 1985 RCW Guidelines, the Council is concerned with the agency's ability to obtain such funds on a yearly basis considering the current federal budget deficit and a decreasing revenue from timber sales nationwide. It is our understanding that the DEIS was put together without concern for budgetary constraints. If that is the case, it is crucial that there be a commitment to secure \$14 million per year for recovery of the RCW. Without a full commitment from the upcoming Fiscal Year budgets, the agency's efforts to recover the RCW will be impeded by its own lack of funds.

Lacking from the DEIS is any time frame to achieve recovery. This should be identified in the Final EIS for each population (for both recovery and support populations). The agency needs a specific time target for each objective upon which progress can be measured. Progress toward this time target should be part of the monitoring program as well. It is imperative that the agency monitor its work so that it can decide early whether or not the program is working or whether it is too costly and not achievable. If the program proves to not work, the agency must be prepared to evaluate the obstacles to reaching its objectives and be ready to re-evaluate management options.

#### REPLACEMENT AND RECRUITMENT STANDS

The DEIS still recommends replacement and recruitment stands. A recruitment stand would be located between 1/4 and 3/4 mile from an active cluster and provide potential nesting habitat for RCW expansion of the population. It is the Council's understanding that the Forest Service has no data to date which indicates the success of recruitment stands...no expansion into such areas has occurred. Replacement stands are stands of pine trees located adjacent to or very close to active clusters with the objective to replace existing cluster sites as they become unsuitable for RCW nesting.

With the establishment of HMAs and harvesting methods which retain relic trees and retain more basal area, the Council questions the need for continuing to designate replacement and recruitment stands. The HMA will provide replacement stands and recruitment stands and replaces the need for circle management.

Should the need for replacement stands and recruitment stands be required by the Fish and Wildlife Service (FWS) under the RCW Recovery Plan, the Forest Service should consult with the FWS and consider such changes.

#### HABITAT MANAGEMENT AREAS

The Council is pleased to see that the Forest Service emphasizes that an HMA is in fact a management area as opposed to a preserve. The RCW is dependent on timber harvesting, and through a continuation of such management, the RCW can be recovered. However, the question of time frame and population density is crucial in our specific comments on HMA's.

#### Ability for RCW to use full HMA

The RCW is being provided for in excess of its needs, primarily within the short term.

minimum amount of foraging necessary for a RCW group to function normally (Hooper and Lennartz 1994). There are studies which suggest moderate to high density RCW populations can function on less than the 6350 stems required by the recovery plan (Wood et al. 1985a, Wood et al. 1985b, Conner and Rudolph 1991b, Hooper and Lennartz 1994). A recent study by Beyer et al. (in preparation) found little or no correlation between reproductive success and foraging availability on the Apalachicola National Forest.

The requirement of 6350 stems is based on the average foraging needs of a single RCW population and may not reflect the needs of different populations living in different areas and types of habitat. Therefore, forests that have or in the future plan to complete area/population specific foraging requirement studies are encouraged to pursue such efforts in consultation with the Fish and Wildlife Service. Establishment of new foraging requirements for specific area/populations can occur only with concurrence from the Fish and Wildlife Service. New requirements can then be incorporated in the individual forest plans using the amendment process.

14. The use of artificial cavities and augmentation (translocation) are prescribed and guided by the direction in the selected alternative. Success has been reported with these methods and will continue to be monitored as called for in the EIS.
15. With regard to placing cavities within 3/4 mile from private lands, the aim is to achieve the best results for the RCW and that will normally mean placement of cavities well within the National Forest lands where there is the greatest likelihood of finding favorable habitat. Luring birds from private lands will only be done where there the movement of birds is most likely to be from private to public lands and not the reverse.
16. See Letter #44, Response to Comment #1, Letter #113, Response to Comment #7, and Letter #149, Response to Comment #8. See also, Chapter 3, Regeneration, for discussion of the effects of even-aged regeneration methods.

17. See Letter #33, Response to Comment #60.

18. See Letter #37, Response to Comment #2.

19. See Letter #33, Response to Comment #10.

20. See Letter #1, Response to Comment #1 and Letter #6, Response to Comment #2.

21. See Letter #1, Response to Comment #2 and Letter #205, Response to Comment #8.

22. All EIS alternatives would require a site-specific study for all pine restoration projects. The study must show pine restoration

In circumstances where the RCW population is low and where the time frame to achieve recovery is at least 25-30 years into the future, the Council recommends that the Forest Service reconsider the size of the identified HMA's and the specific Management Intensity Level (MIL) necessary. While the DEIS briefly discusses the concept of a "sub-habitat management area", there is not enough detail on this. For example, which RCW clusters does the agency feel are appropriate for sub-habitat management?

The Council seeks to apply a less restrictive management area in portions of the HMA where it will be years before an expanded RCW population will use such portions. Addressing the specifics on exact locations is not possible because of the lack of detailed information in the DEIS with regard to where the RCW populations are within the HMA. This information should be in the DEIS. The Council strongly recommends that the agency pursue more flexibility on MILs within various sections of an HMA as individual forest plans are amended to include the DEIS guidelines.

As an example, the Talladega/Shoal Creek Ranger District identifies a HMA of 124,247 acres and a 1992 population of 5 active clusters. It will most likely take over 30 years to reach the "tentative population objective" of 413 active clusters. There needs to be flexibility in which MIL should be applied over the total 124,247 acres. It is not appropriate to apply an MIL 4 (the most restrictive management) across the total 124,247 acres when it is impossible for 5 active clusters and any additional expansion, in the near term (e.g. < 10 years) to use the total HMA. A phased in approach should be considered for many such situations and can be accomplished at the forest plan level, if the FEIS provides the necessary flexibility and instructions.

Overall, the HMA for the entire Southern National Forests total some 2 million acres. This represents 44 percent of the total pine and pine-hardwood forests on the 11 National Forests in the South. The current RCW population can not possibly use this substantial amount of acreage within the next 10 - 20 years.

#### Future Size of HMA

The Forest Service has indicated that the total HMA identified across the Southern National Forests is not expected to be expanded. The Council seeks to only re-emphasize this position expressed by the Forest Service in numerous meetings this past February and March. However, the Forest Service should look at reducing HMAs in the future, if recovery occurs in densities needing less than 200-300 acres and if foregiving studies show a reduced need in foraging habitat.

#### Justification for HMA

The Forest Service indicates that the reason for establishment of HMAs is to address fragmentation. The DEIS concludes that regeneration near RCW clusters causes fragmentation and in particular, those of small RCW populations. The DEIS fails to properly address research to the contrary and also fails to note that even within the Scientific Summit (sponsored by the National Wildlife Federation) there "was no agreement as to what constituted fragmentation." (Gene W. Wood Comments on the Summary Report of the Scientific Summit on the RCW, June 26, 1990 -- ATTACHMENT 1).

would have no short-term impacts and a long-term benefit to the RCW. See also the Response to Comment #3 for Letter #197.

23. See Letter #150, Response to Comment #2 and Letter #164, Response to Comment #18.

24. See Letter #27, Response to Comment #1 and Letter #180, Response to Comment #5.

25. See Letter #1, Response to Comment #7, Letter #100, Response to Comment #12, and Letter #113, Response to Comment #11.

26. The suggested flexibility is available to the Forests in conjunction with the direction contained in the FEIS and, where required, with consultation with the US Fish and Wildlife Service.

27. Comment noted.



Other studies not thoroughly discussed in the DEIS include:

- (a) Hooper and Lennartz (1993) where "removal of 43% of the foregoing habitat from a dense aggregation of red-cockaded woodpecker...groups had no discernable negative impact on the study groups."
- (b) Wood (1985) found no adverse effects of harvesting as much as 37% of habitat surrounding RCW groups.
- (c) Beyer et al. (in preparation) monitored RCW numbers on the Apalachicola National Forest for a four year period. They found no relationship between angular sum or amount of harvesting and the number of RCW adults and fledglings.

The studies addressing fragmentation suggest that harvesting, within limits, near RCW groups, even small groups, does not cause fragmentation. At worst, the data on this issue, could be viewed as inconclusive. The Forest Service should consider additional studies of habitat characteristics and group fitness across the Southern region.

#### ECOSYSTEM MANAGEMENT

Ecosystem Management is not discussed in detail in the DEIS, but rather referred to in numerous instances. It appears that the RCW management strategy outlined in the DEIS falls into the purview of an ecosystem approach. However, the Final EIS should clarify how ecosystem management will be applied.

References to ecosystem approach are scattered throughout the DEIS without a clear definition provided to the reader. For example, the DEIS indicates that establishing HMAs "...would allow an ecological approach to RCW recovery." (Page 261). Under a discussion of artificial cavities and translocation (Page 42), the DEIS indicates that the "...Forest Service's long-term goal is the production of suitable RCW habitat through an ecosystem management approach, in which the species can sustain itself without these practices."

The DEIS seems to infer ecosystem management in the discussion of the historical range of the RCW (Page xxvii) and also in discussion of longleaf pine restoration. Regarding longleaf pine restoration, the DEIS often refers to the "historical presence" of longleaf in the South, and notes that longleaf would provide better habitat for the RCW (Page xi). Additionally, in meetings across the South, the issue of "pre-settlement" was raised by the Forest Service with regard to longleaf pine restoration.

In addition, the DEIS discussion on Habitat loss and fragmentation (Page 12) indicates that the "most serious fragmentation resulted from clearing, farming and massive timber cutting activities which began with the arrival of the first European settlers..." The DEIS further mentions this issue in the Biological Diversity discussion (Page 260) whereby "Habitat Management Area designation involves the delineation of an area that represents the desired future ...RCW population...it is a strategy for management at a landscape scale." This section also discusses the impacts of Landscape level management on biological diversity. The impact of Alternative E (page 261) to the landscape level is described as "Establishing

HMA's in these alternatives would allow an ecological approach to RCW recovery."

The issue of ecosystem management is complex and means many things to many people. It is unclear what ecosystem management means to the Forest Service with regard to the RCW management strategy. To the Council, ecosystem management means a resource management system designed to maintain or enhance ecosystem health and productivity while producing essential commodities and other values to meet human needs and desires within the limits of socially, biologically and economically acceptable risk. In a thorough review of this issue with the American Forest & Paper Association, we have adopted key principles of ecosystem management which should be applied in implementation. A copy of the AF&PA paper, which the Council supports, is attached (Attachment 2).

In particular, the white paper points out that in developing a "Desired Forest Condition (See page 3 of Attachment 2), the "...elements of forest structure which existed during pre-European settlement times" should be understood. "However, understanding of pre-European settlement conditions does not imply that restoration of certain conditions should be an objective" (Page 4 of Attachment 2). The desired forest condition, in our view, may vary by region and by national forest. As noted in the White Paper, "The Forest Service should define the desired forest condition specifically in each forest plan, and generally at the national and regional levels" (page 3 of Attachment 2). The Forest Service DEIS implies that it has decided already on the future condition by identifying pre-settlement conditions. Such a decision lacks credibility and is not even thoroughly discussed in the DEIS.

Another key issue is that ecosystem management should be applied across all National Forest lands, including Wilderness areas and non-suitable lands. Already, the DEIS excludes Wilderness areas from the HMA.

The Final EIS must more thoroughly discuss how ecosystem management will be applied; recognize the overall goals of these forest plans; avoid selecting "pre-settlement conditions as an objective (the DEIS jumps to the conclusion that longleaf must be restored to "pre-settlement conditions) and should reconsider the role of Wilderness areas with regard to HMA's and ecosystem management.

#### MANAGEMENT INTENSITY LEVELS

Management intensity levels should not only vary by colony or management area within a forest, but also from forest to forest across the range of RCW. Given the realities of limited budgets, limited time frames for burning, etc.; recovery activities must be focused on those populations designed to recover the species.

It will be important for the Forest Service and the public to recognize that as RCW populations are expended and reach the levels outlined for each Management Intensity Level (MIL), the agency must change the MIL level on the ground. According to the DEIS, the agency will review the MIL status every five years, however, the agency should review the MIL status every year for a rolling 5 year period.

The initiative to recover the RCW species end to move from one MIL to another is



critical. However, the Council does express concern with the ability of the agency to change MIL management on the ground and to resume timber sale programs at higher levels in the future, as provided for in connection with expansion and ultimate recovery of the RCW.

A MIL 1 should allow for a larger timber sale program than a MIL 2 or 3 or 4. However, circumstances such as Florida's Apalachicola National Forest, which is a recovered population and is designated as an MIL 1; resulted in just the opposite...a very limited timber sale program.

#### POPULATION DECLINES/POPULATION OBJECTIVES

##### Population Declines

The Council has expressed over a period of time, our concerns with the validity of RCW population surveys. This concern has only been reinforced during our recent meetings across the South where we have been told by the Forest Service of changes in various "1992 Populations". It is crucial that the agency standardize survey methods and that such methods are adequately and consistently carried out. Any cost constraints or manpower constraints must be addressed. Correct survey information is crucial.

##### Population Objectives

The Council is disappointed that the DEIS identifies the RCW population objectives based on the need for 500 active clusters. In the Council's earlier scoping comments (November 26, 1991) we expressed concerns "...with the Forest Service's support of . . . without justification, a population strategy to require 500 groups as a minimum viable population." Without substantive scientific justification and rationale, the Forest Service continues with this objective in the DEIS.

Target population for support population (not recovery) were essentially backed into based on the estimate of suitable habitat. Therefore, these target population amounts are questionable. They are more subjective than scientific, and should be reconsidered.

A second approach involves the results of the National Wildlife Federation's RCW Summit meeting in 1990. In this meeting, the participants discussed, but did not agree, on the minimum viable population necessary. According to participant Gene Wood's synopsis (Attachment 1, page 6), the summit,

"...in a cavalier fashion, averaged 300 and 509, and without qualification stated that the appropriate guidelines should be 400 breeding pairs. With equal nonchalance the conference accepted that in some population conditions, 20% of the active colonies would be occupied by solitary meles. Therefore, a viable population should consist of 500 active colonies."

Even the Forest Service has indicated that the 500 active colonies objective is "shaky" (Joe Dabney comments, South Carolina, March 2, 1994). However, the Council is encouraged, that comments were also made that the key point is to recognize that what is

needed is "250 successfully breeding pairs to achieve recovery." (Joe Debney, Mississippi, February 24, 1994, Alabama, February 25, 1994 and South Carolina, March 2, 1994).

With the final objective being recovery of the RCW, the Final EIS should mention that the Forest Service will petition the FWS to de-list the RCW once recovery is reached. In addition, as recovery is achieved, the Forest Service should indicate that MIL's should be reconsidered, especially MIL 1 which is for a recovered population.

During the Fish and Wildlife Service (FWS) revision of the recovery plan for RCW, consideration should be given to the originally designated RCW targeted recovery populations (are they still appropriate?) and to the recovery goal for the species as a whole (should it be for the species across the whole region or by physiographic type?). While these are considerations for the Fish and Wildlife Service, the Final EIS should note that the FWS will address RCW recovery and could ultimately impact RCW management on National forest lands in the future.

#### FORAGING

The DEIS (page 50-51) remains consistent with Fish and Wildlife Service (FWS) foraging requirements as outlined in the Blue Book issued by the FWS in 1989. That requirement involves at least 6,350 pine stems 10 inches in diameter or larger and 30 years old or older. The DEIS further states that the foraging criteria are based on three studies conducted on the Francis Marion National Forest (SC). However, as indicated in the DEIS, "It does not represent the minimum amount of foraging necessary for a RCW group to function normally." "There are studies which suggest moderate to high density RCW populations can function on less than the 6,350 stems required by the recovery plan (Wood et al. 1985e, Wood et al. 1985b, Conner and Rudolph 1991b, Hooper and Lennartz 1993)".

Hooper and Lennartz (1993) report states "in conjunction with other studies, the results suggest that red-cockaded woodpeckers are not sensitive to loss of foraging habitat except at low densities, and that low population density, itself, may be a major factor inhibiting expansion of some small populations." The report further states "If RCW groups are not sensitive to loss of foraging habitat, there may be some circumstances when a RCW population would benefit in the long run by having its foraging habitat reduced below that level." Circumstances noted include those areas subject to hurricanes and southern pine beetle.

With all this information, the Forest Service is still requiring what appears to be an excessive foraging habitat density without substantiated benefit (and in some instances potential harm) to the RCW. Hooper and Lennartz also stated "The lack of a negative impact on groups from removal of foraging habitat in our study area was consistent with earlier studies (Wood et al. 1985e, 1985b, Conner and Rudolph 1991). Except in the case of a low density of groups (Conner and Rudolph 1991), these studies suggest that RCW groups are not very sensitive to removal of foraging habitat."

If the Forest Service continues to maintain its position that foraging studies must be done for individual forests, rather than rely on the studies already conducted and those now

being conducted such as in Florida, then the Forest Service must initiate foraging studies within varying physiographic types, to determine the amount of foraging actually necessary. FY 1995 appropriations or FY 1995 supplemental appropriations should provide for such studies. This would provide the necessary information to respond to the DEIS comment on page 51 "...forests that have or in the future plan to complete area/population specific foraging requirement studies are encouraged to pursue such efforts; in consultation with the Fish and Wildlife Service." The Council firmly supports the Forest Service in this recommendation.

It is also important for the Fish and Wildlife Service to reconsider this foraging requirement during the upcoming revision of the RCW Recovery Plan. Newer information must draw attention to the lack of credibility of such a foraging requirement across the entire Southern region.

Of key importance is the current foraging study being conducted in Florida on the Apalachicola National Forest. The study objective in Florida is to determine the relationship of RCW clan fitness and forage habitat quality. According to notes of a February 5, 1993 meeting in Florida, provided by the Forest Service (See Attachment 3), "No relationships were found between our measures of foraging habitat and clan fitness." The notes go on further to state "Though this recent study throws doubt on the 6,350 stems guideline, there is not suitable substitute guidelines available."

While there is "no substitute guideline" identified, it is incorrect for the agency to continue to apply the 6,350 stems guideline to the Apalachicola National Forest. Further, this study, although specific only to Apalachicola, throws additional doubt on the guideline for application to other forests as well.

The Council recommends that, with regard to the Apalachicola, the study for that forest provides a range of sound and valid options for the agency to consider. Data released by the Forest Service (See Attachment 4) shows that the number of 10 inch and greater stems, does not impact the number of young fledged. The graph provided in Attachment 4 shows that 6,350 stems does not represent the magic number necessary for RCW fledgling young. The graph does show that even a level of 2,000 10 inch stems does not negatively impact the number of young fledged. The Forest Service should therefore experiment with a range of reduced foraging requirements for the Apalachicola and monitor the impacts closely. Such adaptive measures will not negatively impact the RCW, but rather have the potential to find a "suitable substitute guideline" which the agency seeks.

At the same time, the Forest Service should be monitoring and sharing with the public, the results of how the RCW is doing on the Francis Marion. The Final EIS should include this new information. The future performance of the population, with such reduced foraging habitat, should be instructive in developing revised foraging habitat guidelines.

#### ARTIFICIAL CAVITIES AND AUGMENTATION

The Forest Service indicates that the use of artificial cavities and augmentation is a short term approach to assistance in RCW recovery. However, the agency should not look

at this option only in terms of short term assistance. The success of both of these activities should encourage the agency to use such measures as an option to longer rotations. For example, instead of waiting for longer rotations to kick in, the use of artificial cavities would be a priority in such areas where cavity trees are lacking.

With regard to augmentation, the Final EIS should provide more information on the impact to the Apalachicola population as this is the source for augmentation. How many RCWs have been moved so far? What has been the success rate? What is the impact to the current population on the Apalachicola? How much is expected in the future?

The Forest Service should also provide some form of annual reporting which would provide a status report on both artificial cavities and augmentation activities by forest and provided in one regional document.

#### IMPACT OF FOREST SERVICE MANAGEMENT TO PRIVATE LANDOWNERS

Management for RCW on National Forest lands extends to the need to recover the species as opposed to the private lands whereby the Endangered Species Act requires only the avoidance of a section 9 "take" of an endangered species such as RCW.

To avoid unnecessary conflict between the Forest Service and adjacent landowners, and to ensure sufficient public land foraging to support the RCW, the Forest Service should not place any artificial cavities or provide augmentation within 3/4 mile of a private land boundary. The Forest Service has indicated that it will attempt to "lure" birds off private lands through artificial cavity placements. Such an objective may be desirable, however, it does not justify the placement of artificial boxes within 3/4 mile of private land. Concern has been expressed that such an objective could not go as planned...it is possible that a new RCW (not from the private lands) will move to the artificial insert and possibly create an increased responsibility to the private landowner.

The Forest Service should also consider individual contact with adjacent landowners when ever an artificial cavity or augmentation project is planned just beyond 3/4 mile of the adjacent landowner's property line.

#### CLEARCUTTING

The DEIS states that "The use of clearcutting has been limited in all alternatives to conform with the Chief's 1330-1 letter dated June 4, 1992..." In keeping with this direction the amount of clearcutting will not vary significantly among the alternatives." (Page 59, DEIS). The Forest Service has indicated in numerous meetings that the decision to severely limit the use of clearcutting (other than for conversion of sites to longleaf) is a decision based on politics, not biology.

Basing a decision on politics and not biology is inappropriate and may even be illegal with respect to an endangered species. Even the Chief's June 4, 1992 policy on clearcutting did not seek to ban the use of clearcutting as a harvest method. The policy sought to clarify that "clearcutting is to be used only where it is essential to meet specific forest plan



objectives end..." under certain circumstances. The Chief went on to describe those circumstances which either one or more could be cause to select clearcutting. These circumstances included:

1. to establish, enhance or maintain habitat for threatened, endangered or sensitive species,
2. to enhance wildlife habitat or water yield values or to provide for recreation scenic vistas, utility lines, road corridors, facility sites, reservoirs, or similar development,
3. to rehabilitate lands adversely impacted by events such as fires, windstorms, or insect or disease infestations,
4. to preclude or minimize the occurrence of potentially adverse impacts or insect or disease infestations, windthrow...
5. to provide for the establishment and growth of desired trees or other vegetative species that are shade intolerant,
6. to rehabilitate poorly stocked stands due to past management practices or natural events,
7. to meet research needs.

The need to maintain the use of clearcutting has even been supported by the Forest Service Region 8 office. In an October 1992 correspondence from Region 8 (Attachment 5), the Regional Forester noted "...this information makes it clear that clearcutting is and will remain a management tool necessary to meet the goals and objectives we establish for each National Forest. We couldn't agree with you more that sound forest management which ensures regeneration has and will continue to assure that our forests will be productive."

Furthermore, policy positions of four highly respected organizations: Southeastern Section of the Wildlife Society, the Society of American Foresters, the Southeast Association of Fish & Wildlife Agencies, and the National Wild Turkey Federation support the use of clearcutting as an appropriate means to accomplish forestry and wildlife objectives. (Attachment 6).

From a biological point of view, the DEIS states (Page 27) that "In the short term, clearcutting, if not properly prescribed, can contribute to RCW habitat fragmentation." The DEIS fails to properly address research to the contrary and also fails to note that even within the Scientific Summit (sponsored by the National Wildlife Federation) there "was no agreement as to what constituted fragmentation." (Gene W. Wood Comments on the Summary Report of the Scientific Summit on the RCW, June 26, 1990 -- ATTACHMENT 1).

Other studies not thoroughly discussed in the DEIS include:

- (a) Hooper and Lennartz (1993) where "removal of 43% of the foraging habitat from a dense aggregation of red-cockaded woodpecker...groups had no discernable negative



impact on the study groups."

(b) Wood (1985) found no adverse effects of harvesting as much as 37% of habitat surrounding RCW groups.

(c) Beyer et al. (in preparation) monitored RCW number on the Apalachicola National Forest for a four year period. They found no relationship between angular sum or amount of harvesting and the number of RCW adults and fledglings.

The studies addressing fragmentation suggest that harvesting, within limits, near RCW groups, even small groups, does not cause fragmentation.

The Forest Service must re-look at its decision with regard to clearcutting, and provide for more of this harvest method within MILs other than MIL 1. Even in MIL 1, the agency should make it clear that clearcutting will not adversely impact the RCW.

#### IRREGULAR SHELTERWOOD

The irregular shelterwood differs from a normal shelterwood in that the final cut may occur later in the rotation or not at all. The irregular shelterwood also leaves between 25 - 40 basal area of pine depending on which MIL is in place (MIL 3 leaves 25-30 BA; MIL 4 leaves 40 BA). This method also requires the leaving of 6 relic trees per acre in MIL 2, 3 and 4. (Table 1-2, DEIS, Page 6).

According to the DEIS, "the irregular shelterwood is an untested regeneration method..." (DEIS, Page 62). The use of untested systems should be of concern to the agency, especially when it will be applied to such a vast area. In the September 7, 1989 Fish and Wildlife Service biological opinion to the Forest Service (regarding the Federal District Court in Texas order for RCW management on Texas National Forests), the FWS addressed an "untested system". Specifically, the FWS stated:

"It is my biological opinion that implementation of the December 15, 1988 Comprehensive Management Plan for RCW on the National Forests in Texas is likely to jeopardize the continued existence of the species. The Plan requires implementation of an unproven system of forest management. It would also require a level of forest administration and intensive management that from my perspective, is unattainable."

Comments expressing concern with regard to the use of irregular shelterwood have been expressed since 1991 to the Forest Service. In particular, some of those comments have been as follows:

1. Bob Huoper, June 28, 1991 -- "RE: Shelterwood discussion. As a general practice, I cannot see the logic in retaining the overwood in shelterwood regeneration areas beyond normal silvicultural practice for the following reasons: (1) the purpose of the regeneration should be to provide an even flow of RCW habitat over time. At least in longleaf pine, growth of the regeneration is severely retarded by only a few canopy trees per acres. Given the minor amount of regeneration possible under the proposed

rotation ages, would it not be smarter to have good growth in these younger stands?" (Attachment 7 - page 7).

2. Gene Wood, August 26, 1991 -- "...the modified shelterwood/saedtraa can, and in my experience, often will, lure birds into a new colony development situation where the colony habitat will deteriorate rapidly without major continuous investment in colony habitat management." (Attachment 8).

3. David H. Ven Lear, February 7, 1994 -- "I question the capability of the irregular shelterwood method to produce suitable RCW habitat over the long term."

"If the irregular shelterwood method is used, especially at intermediate levels of residual overstory density, the regeneration layer will eventually grow...into the upper canopy, thereby restricting nesting sites."

"If the overstory density is too heavy, the regeneration layer is restricted and may develop poorly, thereby delaying the recruitment of large trees into the overstory." (Attachment 9).

The Council is concerned with the use of irregular shelterwood due to the potential adverse impacts to the RCW and productivity of the site. The potential for the regeneration to become the "mid-story" which would have to be controlled, presents its own set of problems and hazards to the RCW (See comments under PRESCRIBED BURNING/MID-STORY CONTROL).

The DEIS lacks the recognition that silviculture can grow trees faster and produce heartwood quicker. However, applying a silvicultural method which retards productivity, such as irregular shelterwood, will only delay the production of heartwood.

Use of the irregular shelterwood on species including longleaf, has not been tested operationally on the scale proposed in the DEIS. The Forest Service should consider a trial basis for use of irregular shelterwood...before applying it to such scale across the HMA's (HMA's for MIL 2, 3, and 4).

#### Relict Trees

The Forest Service proposes to maintain > 6 relict trees per acre in MILs 2,3, and 4. Based on RCW clusters of 1 per 200 to 300 acres, these guidelines will provide a minimum 1,200 to 3,000 relict trees per RCW group. While not all relict trees will be suitable for cavities, if even only 25% of relict trees are used by RCWs, there would be at least 300 to 750 potential cavity trees available for each RCW group. If 50% of relicts are suitable, at least 600 to 1,500 potential cavity trees would be available. The technical basis and justification for providing for more relict trees than actually needed is unclear. The RCW will not be able to utilize even a small portion of the residuals. A more realistic standard might be 6 trees, clumped, per 10 acres.

## ROTATION

The DEIS fails to look at options for achieving heartwood which is the major objective in extending rotation ages. Clearly, the DEIS fails to recognize the role of silviculture in obtaining heartwood at earlier ages. In Hooper's comments on the Forest Service precursor to the DEIS, the issue of rotation is discussed. Hooper states "Again, I am simply pointing out that it does not necessarily follow that older forests are inherently better than younger forests for the RCW." (Page 4, Attachment 7).

Comments provided by W.V. McConnell to the Forest Service (February 16, 1994) raises the issue of rotations through a discussion of photo records indicating intensive timber management with moderate rotations, and successful RCW. Again the establishment of rotation ages and silvicultural regimes must be considered on a site by site basis.

Basing the established rotation ages on one study of when heartwood is developed is not scientifically sound as it provides no measure of variability across sites within the range of RCW. It clearly does not provide for silvicultural options to produce heartwood quicker. Again, adaptive management experiments testing several rotation lengths should be pursued. It would be appropriate for the regional guide to provide flexibility in rotation ages to accommodate different sites. The Final EIS should be a guide not a limitation set at a regional level. Such a guide could allow for different rotation ages based on site specifics and silvicultural opportunities to grow heartwood quicker.

## PRESCRIBED BURNING/MID-STORY CONTROL

The selected alternative provides for prescribed burning every two to five years during the growing season, where appropriate. In some areas burning to accomplish habitat goals may require burning whenever conditions permit year-round.

### Capability

The Council is concerned with the ability of the agency to conduct the level of prescribed burning that will be required each year under the chosen alternative. Our concerns stem from the financial and manpower needs as well as state smoke management limitations. The ability to conduct prescribed burning "when conditions permit" can be very limiting by itself. The importance of mid-story removal through prescribed burning is essential to RCW recovery. However, the Council points to the past record of the Forest Service to carry out the recommended prescribed burning under its 1985 guidelines: a much smaller program!

### Potential Impact to Wildlife

The Council is concerned with the potential impact to certain wildlife species dependent upon understory vegetation. In particular, some members have raised concern with prescribed burning in stands where wild turkey may just been introduced, and during optimum turkey nesting season. It is crucial that the Forest Service carefully consider burning regimes, both in terms of timing and location. The agency must be further sensitive to the ongoing and future re-introduction programs for turkey. The agency should also monitor such

burning activities with regard to the long term impact to wildlife.

#### Mechanical and Herbicide mid-story control

21 The DEIS states that "where the mid-story vegetation is too large to be controlled by prescribed burning, the Revised Handbook would prescribe other methods such as chemical, mechanical, or manual control." (DEIS, Page 9).

These options may be very limited due to the lack of public acceptance of herbicide treatments and the prohibitively high mechanical costs. For example, one of our concerns with the irregular shelterwood method is that the regeneration will actually become the "mid-story" due to the retention of the overwood. In expressing this concern, the Forest Service has indicated that controlling the regeneration or "mid-story" under the irregular shelterwood could involve a mechanical control within a 50 foot area of clusters. This could be difficult to achieve in times of manpower shortage and high costs, and could make the concept of irregular shelterwood more of a hazard than recovery for RCW.

#### LONGLEAF RESTORATION

22 The DEIS looks to longleaf restoration to promote RCW recovery. This policy direction fails to recognize the ability of the RCW to use loblolly successfully and which also grows heartwood quicker than longleaf. The promotion of longleaf seems to hinge more on the "pre-settlement" conditions as opposed to a biological RCW need.

The Final EIS should allow for more flexibility in making such decisions rather than mandate longleaf restoration to longleaf sites. The DEIS fails to recognize that every acre that was once longleaf might not be best suited for longleaf today. Only site specific considerations can make such determinations.

#### MONITORING

23 Monitoring is key to making sure that the recovery plan is working. The agency should address a time frame under which it expects to reach recovery. In addition, interim time frames should be identified with specific objectives. Lastly, monitoring must establish a time frame to assess irregular shelterwood and success of the plan and be ready to revise the plan if needed.

The Forest Service should make sure, through this comment process, that the monitoring program will in fact, be statistically and biologically acceptable. From there, it will be important that funding is provided and that monitoring is carried out consistently throughout all forests.

#### ECONOMIC/SOCIAL IMPACTS

The Forest Service in numerous instances, is quick to state that the HMA's "only

24 represent 1 % of the commercial timberland in the South". However, this statement fails to recognize the larger issue that the HMAs represent 44 percent of the pine, pine-hardwood types on the Southern National Forests and represents as high as 70% of some individual forests such as the Bienville in Mississippi.

The DEIS fails to address the localized impacts on a forest by forest basis. It is impossible for the public to understand the true impacts of the DEIS since no information is provided for on a forest by forest basis. This information should be included in the Final EIS, especially since it is already available. This should include, by forest, the timber volumes, county payments, jobs and income impacted by alternative.

In the amount of timber sale volumes identified in the DEIS, the Council requests further explanation as to other cumulative impacts which could reduce the timber volume numbers identified.

As the Forest Service already knows, the DEIS inappropriately calculates baseline numbers in Tables S-5 and S-6. In both tables, the "baseline" columns are in 1988-89 dollars and are shown as a constant figure over a 30-year period. By contrast, values generated by the "alternatives" are expressed based on higher prices attained during the 1992-1993 period. For an accurate comparison, dollars associated with the "baseline" and the "alternatives" should be expressed in the same constant dollars.

#### WILDERNESS

25 The DEIS inappropriately excludes Wilderness areas from the role of RCW recovery. In some forests, Wilderness areas represent a substantial opportunity for playing a role in RCW recovery. The Final EIS must address this role and provide for a management guide which would utilize Wilderness areas with some type of mid-story control recommended. While the individual forests can address this more specifically, the regional document must take a more active and positive approach. This would be consistent with previous Forest Service actions to manage Wilderness areas to protect RCW ... a most recent incident was in Texas where the agency was taken to Court for controlling Southern Pine Beetle which threatened RCW (the Forest Service actions were upheld by the Court). This role has been furthered in federal legislation proposed by Congressman Wilson (Texas).

#### FLEXIBILITY AT FOREST PLAN LEVEL

26 As indicated in the beginning of our comments, the Forest Service must pursue flexibility in applying management techniques, on a forest by forest level. While it is essential to take a regional look at the recovery management techniques for RCW, it must be emphasized that an across the board solution is not capable of responding to specific site conditions.

The Council looks for serious consideration to further expand on the flexible nature of a modified Alternative E as we have suggested in these comments. We are convinced that recovery of the RCW can be accomplished, in the long term, with even more site specific



management approach. Factors which should be considered at the forest level include (1) the importance of a particular RCW population to the overall survival of the RCW; (2) the RCW population trend in that forest; and (3) other local conditions. Amendments and revisions of forest plans can achieve this, if the regional guide (RCW Draft EIS) provides for sufficient flexibility.

Certainly it would be helpful for the agency to provide more detailed information on the specific options available, and clarify the amount of flexibility possibly by management technique (e.g., rotations, foraging, etc.).

#### TEXAS SITUATION DUE TO LITIGATION

As the DEIS indicates, "Regardless of alternative selected the National Forests in Texas present a special case, remaining under a court ordered RCW management plan." While the Forest Service has provided the Court with the Interim Guidelines (IG), the court has not ruled on the IG. The Council is in strong agreement with the DEIS which further states "If the court has not ruled by the time this EIS is completed, the Forest Service would submit the revised Handbook...to the court." (DEIS, Page xii).

#### CONCLUSION

The Council appreciates this opportunity to present our comments. We look forward to reviewing a Final EIS.

Sincerely,



Deborah B. Baker  
Executive Director

Enclosures

Attachments (not included here) to Comment Letter #201 (Deborah B. Baker)

Attachment 1 - Letter - Clemson University - Professor Gene W. Wood

Attachment 2 - Article - Ecosystem Management: A New Approach to Federal Management and Planning

Attachment 3 - Letter - Donna L. Hepp and Summary of Meeting (Feb. 5, 1993)

Attachment 4 - Graphic

Attachment 5 - Letter - John E. Alcock

Attachment 6 - Resolution - Even Aged Forest Management

Attachment 7 - Letter - Robert G. Hooper

Attachment 8 - Letter - Gene W. Wood

Attachment 9 - Letter and Resolution

**PETERSON**  
20 DISTRICT FLORIDA

COMMITTEE  
ON  
APPROPRIATIONS  
SUBCOMMITTEES  
ENERGY AND WATER  
RESOURCES  
AGRICULTURE AND RURAL  
DEVELOPMENT

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
U.S. Forest Service  
1720 Peachtree Road N.W.  
Room 718N  
Atlanta, Georgia 30367

Dear Mr. Dabney:

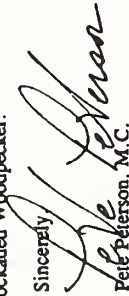
I would like to take this opportunity to submit my comments for the record concerning the Draft Environmental Impact Statement (DEIS) for the Management of the Red-cockaded Woodpecker.

First of all, I would like to state my support for conserving the Red-cockaded Woodpecker (RCW). However, I am troubled that the permanent management decisions for the RCW will be based on bad science. Further, reading of the draft proposals listed in the DEIS, lead me to worry that the Forest Service and Fish and Wildlife will conclude that we should make every National Forest a wildlife refuge. This is clearly not a best used philosophy.

I maintain that decisions made in a management strategy of this kind must be based on the best scientific data available from all credible sources. Furthermore, to consider a draft of this magnitude, we must consider the total ecosystem, not just the immediate area involved. When making the final determination for the management of the RCW in the Apalachicola National Forest, I hope that we will utilize what we have learned from the Pacific Northwest management scenario.

Thank you for giving me the opportunity to comment on the Draft Environmental Impact Statement for the management of the Red-cockaded Woodpecker.

Sincerely,

  
Pete Peterson, M.C.

DBP:mk

*Rec RCW  
3/12/94*

202

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Response to Comments in Letter No. 202

From: Pete Peterson, Congressman from Florida

Comment No.

Response

1. The regional RCW strategy is based on sound objective science and utilizes the most recent research findings. Under the proposed strategy, National Forests will continue to be managed for multiple uses including the sustained yield of forest products.
2. The RCW strategy is based on managing the entire ecosystem involved for numerous benefits. There are 177 threatened, endangered, or sensitive species associated with RCW habitats throughout the South. Of these 177 species, 31 are currently federally listed as threatened or endangered, and 77 are candidates for listing. The ecosystem management strategy should benefit the 31 listed species and may preclude the need to list the 77 candidate species.



203  
National Wild Turkey Federation, Inc.

Wild Turkey Center, P.O. Box 530, Edgefield, South Carolina 29824 (1-803-637-3106)

March 25, 1994

Bob Joslin  
Regional Forester  
U.S.D.A. Forest Service  
1720 Peachtree Road NW  
Atlanta, GA 30367

Dear Mr. Joslin,

Thank you for the opportunity to comment on the draft Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its habitat on National Forests in the Southern Region (EIS). My comments on behalf of the National Wild Turkey Federation (NWTf) will be in response to the presentation that Joe Dabney made to our staff a short while back, and the paper "Red-cockaded Woodpecker Recovery: An Ecological Approach to Managing Biological Diversity" by Dennis Krusac and Joseph Dabney. I would have liked to have made more intensive comments, but we received the draft EIS on March 21 and did not have enough time to complete a more comprehensive review before the deadline of March 25.

The NWTf has always supported proper management of our National Forests. We see it as our role to provide partnership support for the Forest Service both in terms of technical assistance, and in partnership funding of biologically sound habitat improvements. We also see it as our duty to insure that wild turkey habitat needs are included in any management program, particularly when large scale vegetative manipulation is involved. We strongly support active management of our National Forests for all wildlife species, particularly the wild turkey.

There are two specific concerns and two general concerns with the EIS and the program that will result if it is implemented. Our specific concerns with the EIS are: the amount of acres that will be intensively managed for the red-cockaded woodpecker (RCW), the intensive and extensive use of fire during the growing season to create and maintain these areas. In general, we are concerned about accountability and program funding.

Response to Comments in Letter No. 203

From: National Wild Turkey Federation

Comment No.

Response

SPECIFIC CONCERNS

1. Management for the RCW will occur on more acres than were previously involved. This includes thinning of pine stands, even and uneven aged timber management, prescribed burning, and midstory control. These activities will be implemented over a period of time and will provide a diversity of habitats and a balanced age class distribution. This strategy can not be implemented all at one time and will not result in the desired future condition being attained at a point in time. The variety of activities it will take to provide suitable RCW habitat will be implemented over time. The most intensive management will occur in stands supporting RCW clusters, primarily within the cluster. Much of the timber program will involve thinning and the other major activity will be prescribed burning. For those National Forests with a large prescribed burn program (such as the Francis Marion, Appalachicola, and National Forests in Louisiana), the intensity of management will not be much different than is currently practiced as those forests support large populations of RCW because the habitat within the proposed HMA's is generally in a suitable condition at the present time.

2. The proposed alternative states that the USDA Forest Service will schedule prescribed burns during the growing season where appropriate. Although a total of 490,000 acres are proposed for burning, no specific acreages are given for the amount to be conducted during the growing season. Conducting growing season burns at any time will be constrained by manpower, funding, smoke management, and safety of Forest Service personnel. Traditionally, most acres were burned during the growing season, and many acres will continue to be burned during this period. The window of opportunity to conduct growing season burns is much more limiting in the spring and summer, and given the constraints present will all prescribed burning it is likely that dormant season burns will be a major tool in the maintenance and treatment of RCW habitat. Impacts to ground nesting species from growing season burns will be minimal because large acreages can not be burned at one time given the current smoke management constraints. Some wildlife may be displaced to transition zones and hardwood areas, but other species will benefit (bobwhite quail, Bachman's sparrow, etc.)

The Forest Service recognizes the increased risks and costs of growing season burns. However, risks are also present during the dormant season. Given the current regulations for conducting a prescribed burning any season, it is necessary to carefully plan and implement any



## SPECIFIC

### PROGRAM SIZE

The amount of land to be managed for RCW is extensive. Krusac states, "The minimum size HMA (Habitat Management Area) identified is 16,000 acres. In many cases, entire National Forests are identified as HMAs." While intensive management is not prescribed for all acres within an HMA, to meet the tentative population objective of 9,300 active clusters, it is obvious that large acreage will be involved. As with timber sales, impacts will vary depending on how, and where the acres are located. We are concerned that full implementation will annually require intensive management on more acres than were involved annually in timber harvests in the last decade.

### BURNING

Under all alternatives, a large number of acres will be burned during the spring and summer nesting season on a regular basis. Burning during the prime nesting season for wild turkeys and other wildlife species, particularly ground nesters, will have a negative effect on populations. How significant that effect will be is dependent on many factors, including surrounding vegetation, weather and time of burn. However, it is intuitively obvious that the more acres burned, the greater the effect. Full implementation of alternatives B through E would affect a large enough acreage to potentially affect populations.

Burning during the growing season will increase costs and risks. With higher daily temperatures, more people will be required on the fire line to keep the fire within the designated area. This increases costs, which can be substantial depending on time of burn and fuel load within the burn area. There is also an increased risk of fire escaping the control lines. An escape fire during the hot days of growing season will be much more difficult to put out. We believe there is a great risk of losing the managed fire program if a fire escapes during the burning season. After seeing how the public responded to the 1988 Yellowstone fires, it is not hard to imagine a situation here in the southeast, where, after watching an escaped fire on the TV news, the public decides it has had enough of controlled burning. I believe this is a real possibility, and like clearcutting, controlled burning could be eliminated as a management tool for the Forest Service.

I do find it ironic that the Forest Service is now proposing a large-scale burning program. The NWTF has always proposed burning as a major means to manage habitat. For years we have beseeched the Forest Service to expand their burn program, and it has been frustrating, to see only a small increase in the number of acres burned. Now, however, if fully implemented, the

burn. Also recognized is the current threat to losing fire as a management tool. The burn programs must be continued and this can be accomplished through careful planning and implementation.

The scope of the burning program in the past and as proposed here is neither intended to be minimum or maximum. The intent of this proposal is take an ecological approach to habitat management, ensuring the long term recovery of the RCW. One reason for the RCW's declining population trend in the past has been the lack of a quality prescribed burning program. Several National Forests (including the Francis Marion National Forest, Appalachianicola Forest, and the National Forests in Louisiana) have historically had very large prescribed burn programs and at the same time providing superior hunting opportunities as a result of that program.

3. This would be a very important research project. Little literature is available on this subject, yet the literature that is available does not suggest major adverse impacts. Provisions are present in the proposed alternative to retain midstory and canopy hardwoods, and to protect transition zones. In addition, some mast producing species such as dwarf live oak and runner oak are enhanced through prescribed burning.

4. Until the congressional mandate of managing endangered species changes the USDA Forest Service will continue to conduct a program for endangered and threatened species. These funds are earmarked at the congressional level, and hopefully through working with organizations such as the National Wild Turkey Federation, other wildlife habitat improvement programs will receive additional and continued funding. The National Wild Turkey Federation has been extremely supportive of the our efforts to enhance wildlife habitat, and it is through your efforts that much needed habitat improvement work has been accomplished.

Although the RCW is the focus of this recovery program there are 68 species that are candidates for being listed as threatened or endangered which occur in RCW habitat. Fire control and adverse modification of the fire regime has resulted in marginal habitat conditions for most of these species, including the RCW. By taking an ecosystem approach to management of the RCW, habitat for these other species will be provided.

required burn program identified in this EIS (490,000 acres annually for the proposed alternative), will be manyfold larger than anything we, or the Forest Service, contemplated in the past. There seems to be no middle ground, it is either a minimum program or something approaching maximum.

#### GENERAL CONCERNS

##### ACCOUNTABILITY

The members of the NWTf are volunteers who give of their time and money to help provide good management of the wild turkey. Their question is simple and direct: how will this proposal affect the wild turkey and its habitat? While the answer to this question depends a lot on where the acres are located and how they are treated, we believe it is a legitimate question and should be answered. It is our concern that this EIS, once approved will dictate priorities for land management which could adversely impact the wild turkey and other wildlife species. To honestly evaluate the impacts of implementation on wild turkeys, a monitoring/research program should be developed to test the assumption that, "No wildlife species will be eliminated from the 3/4 mile circles. Instead, they would be displaced to the transition zones between pine ridges and hardwood areas" (page 221, EIS). We offer our assistance to help evaluate how wild turkeys respond to this type of intensive management.

##### FUNDING

Implementation of any alternative, with the possible exception of alternative A, will require funding that currently does not exist. Recognizing that the Endangered Species Act (ESA) has mandated requirements, and with the knowledge that is no sympathy for budget increases in the Congress, the only way the Forest Service is likely to meet the large scale program outlined in this EIS is to shift money from other programs. The last few years have made it apparent that one of the first programs sacrificed in times of budget shortages in the Forest Service is the habitat improvement programs, particularly for non-threatened or endangered species. Since 1986 the NWTf has helped fund more than \$1.5 million of habitat improvement projects with the Forest Service. We strongly feel the need to continue this active management of habitats for all species including the RCW and the wild turkey.

This EIS addresses the need for just one T&E species. The amount of acres and dollars it will require to delist this species is significant. We are concerned that there are many other T&E species which will also require acres and dollars to meet recovery requirements. Looking at these species one at a time is folly. We would like to see a broader approach which looks at habitat and ecosystems, but still provides accountability for individual species such as the RCW and the wild turkey.

In summary, we recognize the need to manage for recovery populations of the RCW, but we are concerned that a burning program of the magnitude that is proposed in the EIS has the potential to affect wild turkey populations. In addition, we are very concerned that funding for habitat improvement programs will be drastically reduced or eliminated to fund implementation of this EIS. We will oppose any such large scale reductions in our partnership projects program.

Thank you for the opportunity to comment on this EIS. The NWTf is proud of its "Making Tracks" partnership with the Forest Service, and hopes to continue to expand our cooperative projects program. Please feel free to call me if you have any questions.

Sincerely,



James Earl Kennamer  
Director, Research and Management

pc: NWTf BOD  
Rob Keck  
Dept. Heads & Assts.

03/25/1994 14:28 5013947333

VERNON BATES

PAGE 01

*205*  
*Per RCW*

Al Brooks  
HCR 67 Box 50  
Weidron, AR 72958  
March 24, 1994

Joseph M. Debney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd. NW, Rm 718N  
Atlanta, GA 30367

Dear Mr. Debney:

I have reviewed the Draft EIS for the Management of the RCW and agree in principle with setting aside long rotation Habitat Management Areas (HMA). Some concerns remain, and are listed below:

1) GROSS HABITAT MANIPULATION. The McCurtain County Wilderness in Oklahoma, which had not been managed since its turn-of-the-century establishment, after consultation with the US Forest Service, undertook a story removal, thinning, and burning to benefit its RCW population. At least one bird fled, since it was spotted sometime later 50 miles away in the Ouachita National Forest. Jackson, in his paper "Intercolony Movements of Red Cockaded Woodpeckers in South Carolina" warns about the consequences of just such activities. Your EIS does not instruct that large changes must be accomplished slowly in stages and on pp. 202 & 211 does not disclose these possible consequences of over zealous aid story removal or thinning.

2) FREQUENT LOW-INTENSITY BURNS. These are not equivalent to the infrequent high-intensity fires, tornadoes, and hurricanes that established expanses of southern pine which supported large RCW populations. Frequent burns can impact small vertebrates, reptiles, amphibians, insects, fungi, soil organisms, etc. Page 221 reveals only a few of the effects. Low-intensity burns may also produce more toxic combustion products and particulate emissions, thereby putting inholders and nearby towns and villages at increased risk for pulmonary disease and cancer.

3) TRANSLOCATION. This may be a futile recovery gesture in the light of recent experience in the Ouachita NF. Many translocated birds have simply vanished. Harris, on p. 96 of "The Fragmented Forest" details possible negative effects even of "successful" translocation.

4) FRAGMENTATION. Limiting even age regeneration to 25 acre patches will not eliminate fragmentation, but merely reduce the scale (see Hunter, "Wildlife, Forests, and Forestry", pp. 80-83). A better approach to retaining maximum contiguous blocks of nesting and foraging habitat would be to adopt the Harris model

Response to Comments in Letter No. 205

From: Al Brooks

Comment No. Response

1. Comment noted.

2. In many instances, the encroachment of midstory vegetation has resulted in the abandonment of Red-cockaded Woodpecker (RCW) cluster sites and is recognized as one of the primary factors leading to RCW population declines. Controlling woody midstory species and thinning pine stands are essential activities in the production and maintenance of quality RCW nesting and foraging habitat. All alternatives described in the FEIS encourage these activities and recognize that they are the primary silvicultural activities needed to create the open park-like stands preferred by RCW. As with any habitat improvement practice, there are risks involved; but in a large majority of the cases, the indirect effects of improving the overall habitat quality of these areas will benefit the RCW. Based on site-specific conditions, the amount of midstory vegetation to be removed or the basal area of pine to be cut at one time can vary.

3. Fire, like any other natural disturbance or management activity, produces positive effects for some plant and animal communities and their habitats while negatively impacting others. There are many plant and animal communities associated with the same fire dependent ecosystems which support(ed) healthy RCW populations. Current information indicates that, like the RCW, many of the species associated with these communities are also in decline. These plant and animal communities are also expected to benefit from the fire regimes prescribed in the selected alternative. Whenever the Forest Service uses prescribed fire, it must comply with all federal, state and local laws and regulations regarding smoke emissions and public safety.

4. The Forest Service and the U.S. Fish and Wildlife Service agree that the translocation of RCW from one location to another is critical to the viability and eventual recovery of existing small populations. Translocation efforts currently taking place across the Region are very closely monitored to ensure that every effort is made to maximize the success of relocations and minimize the effects on the donor populations. It is recognized that the potential for mortality through stress or other factors exists. However, in the professional opinion of RCW biologists and research scientists, the benefits of this management tool exceed the risks that may be incurred during the process.



(or wagon wheel approach) for landscape management. By sequentially regenerating segments around the circle on a 120-year rotation, one moving edge is created and smooth ecological gradation results as wildlife traverses (by choice or necessity) from one to the edge.

5) DEFERRED ANALYSIS. This EIS, p.xx1, claims to be a programmatic document and defers analysis of certain environmental effects to site-specific plans. We have already recognized this as a disingenuous strategy to avoid analysis altogether in the Vegetation Management EIS. We are not twice fooled by the same scam.

6) MONITORING. The monitoring described on pp.x, 189, 191, should also include validation to detect negative effects on wildlife species other than RCW.

7) PESTICIDES. On pp. 6, 9, and others, the option to use pesticides is retained. The original VMEIS is incomplete and outdated as far as disclosure of herbicide effects. This application would put pesticides in the proximity of an endangered species and is therefore deserving of complete reanalysis.

8) NOMENCLATURE. On pp.vii, xxix, & xxx, a nomenclature change is proposed. I fear that such change obfuscates the familial relationships inherent in the expansion of colonies and clans, and will blind us to the differing consequences of natural recovery and the effects of translocation.

9) SNAGS. On p. 170 there is allowance for cutting snags that pose a safety hazard. A further mitigation should be added (per Hunter p. 177) that snags will be cut (if necessary) at a two meter height so that it is still useful to some wildlife.

In summary, management of RCW habitat should avoid being heavy-handed, both for the sake of RCW and all the other wildlife that shares these forests. In species (MIL 5) colonies such as those on the Ouachita NF, the probability of extirpation is high no matter what heroic efforts are employed. We should therefore not jeopardize other species in our efforts to save the RCW.

I hope these comments will be helpful to you.

Sincerely,

*Cal Brooks*

5. The potential for fragmentation of RCW habitat within the HMA is limited by several factors. Extended rotation lengths will directly affect the amount of regeneration which can occur. Limitations on regeneration harvest methods, high leave basal areas in irregular shelterwood harvests, maximum regeneration area size and the retention of relicts and longleaf pine inclusions in restoration harvests all contribute to reducing the potential effects on the RCW. Additional constraints regarding the fragmentation and isolation of critical RCW habitat elements, such as foraging habitat, recruitment and replacement stands, and neighboring cluster sites also minimizes the adverse effects on RCW movements. The preferred alternative also places additional constraints on the amount of forest canopy removal that can take place within 1/4 mile of an active RCW cluster.

6. The Forest Service utilizes and the courts have consistently validated the use of a multi-staged decision-making process. Decisions such as the RCW FEIS and the Vegetation Management EIS are programmatic in nature. Programmatic documents generally identify actions that may take place, while future site-specific decisions relate specifically to an actual site being affected. The use of a staged decision-making process is not to avoid environmental disclosure but to recognize that complex environmental issues covering a large geographic area such as the southern coastal plain and piedmont cannot possibly cover all site-specific conditions. Programmatic documents therefore provide broad general guidance intended to maintain uniformity of implementation regionwide.

7. The monitoring program given in the selected alternative is intended primarily for RCW populations. Each individual National Forest will be required to monitor the effects of the final RCW management strategy as well as any other management strategies on wildlife and plant populations through the management indicator concept. This complete monitoring program should be found in the individual Forest Land and Resource Management Plans.

8. The selected alternative of the FEIS allows for the use of herbicides. Whether or not herbicides or other allowable treatments will occur will be decided at the local level after site-specific analysis is completed.

9. Comment noted. The intent of the FEIS in proposing the changes from RCW colony sites and clans to cluster sites and groups is to alleviate past confusion in the use of the original terms.

10. Comment noted. The intent of the FEIS is to provide consistent regionwide direction for the management of the RCW. The identification and eventual disposal of snags which pose a problem to public safety is a decision that needs to be made at the local level.

03/25/1994 15:52

5013947333

VERNON BATES

PAGE 01

*RCW*

**Vernon Bates**

*Professional Botanist*

Post Office Box 1473, Meau, Arkansas 71953

Phone: (501) 394-7333

206

FAXED

March 25, 1994

Joseph M. Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd., NW, RM 718N  
Atlanta, GA 30367

Dear Mr. Dabney:

1 I only recently learned about this project. Will you please extend the comment period so that I may have more time to review the Draft EIS?

2 Also, will this EIS require the establishment of an HMA on all of the southern region forests?

Thank you.

Yours truly,

*Vernon Bates*

Vernon Bates

Response to Comments in Letter No. 206

From: Vernon Bates

Comment No. Response

1. The comment period will not be extended.
2. The EIS only requires the establishment of HMAs on forests that had active RCW clusters in 1986.

# ATLANTA AUDUBON SOCIETY



Atlanta Audubon Society  
P. O. Box 29217  
Atlanta, GA 30359  
March 23, 1994

Joseph Dabney  
RCW EIS Team Leader  
US Forest Service  
1720 Peachtree Rd., NW Rm 718N  
Atlanta, GA 30367

Dear Mr. Dabney,

The Atlanta Audubon Society, with over 4200 members in northern Georgia, has had a long-standing interest in appropriate management planning for the Red-cockaded Woodpecker (RCW). We have submitted a joint public comment letter with Southern Environmental Law Center, National Wildlife Federation and other groups, but we also offer these additional comments. Overall we feel that the US Forest Service (USFS) preferred alternative (Alternative E) for RCW management is a marked improvement over previous efforts. In particular, the setting of population goals will help drive management decisions. However, we prefer Alternative D and offer several specific suggestions for improvements.

First, the USFS should give further consideration to wilderness alternatives for RCWs. Specifically, the USFS should modify RCW management in proposed wilderness areas in the Oconee and other National Forests to allow for wilderness designation. Although scientists have two decades of experience in intensively managing RCW's, that is a limited time on a population biology scale. Some wilderness areas may well provide a "control" in the management experiment we are conducting with the entire RCW population.

Second, we hope that the USFS will develop a greater margin of safety in the incorporation of the EIS into individual forest plans, and as our understanding of RCW population dynamics improves. The recent hurricane that affected the RCW clusters in Francis Marion National Forest is an example of the catastrophic events that could devastate the best plans based on simple linear assumptions (see also: S. Pimm, et al. "Times to extinction for small populations of large birds," Proc. Nat'l. Acad. Sci. 90:449, 1993). Thus the minimum rotation times for different species of pine may well need to be longer than in Alternative E to guarantee maximum recruitment of new RCW clusters. Given the prediction of increased hurricanes due to greenhouse warming, we should have a larger stock of eligible nest cavity trees available than in Alternative E, so that a sufficient number will

The Atlanta Audubon Society feels that the USFS should not use decreased timber harvests on the Oconee National Forest as a

Joseph Dabney

PO Box 29217, Atlanta GA 30359, (404)955-4111

Response to Comments in Letter No. 209

From: Atlanta Audubon Society

Linda J. Pines

Comment No. Response

1. Comment noted.

2. The role of the Region's wilderness areas in RCW management is addressed in the FEIS; however, additional wilderness recommendations would be considered in the forest plan revisions as individual forests analyze their respective roadless areas.

3. Flexibility is inherent in the strategy and individual forest plans are continually amended as needed to adjust management to such things as hurricanes.

4. The harvest levels on the Chattahoochee and Oconee National Forests is an issue that will be dealt with in the upcoming amendment of the forest land and resource management plan for that area.

5. The projected timber sale revenue displayed in the FEIS is based on the average income generated by harvest of National Forest timber during the period 1988-1989. Payments to States (moneys available to the counties) is displayed based on the average payments generated by harvest of National Forest timber during the period 1987-1989. Baseline rates are presented in 1994 dollars.

March 23, 1994  
Page 2

Justification for increased harvest quotas on the Chattahoochee National Forest or other forests in the region.

Finally, the projected timber sales revenue is probably based on pessimistic assumptions. The worldwide market for forest products will drive up prices on average for southern timber faster than simple extrapolations of past prices suggest. Logging virgin timber is coming to the end of the road in many regions of the world, at the same time that the US and world human populations are increasing rapidly. This is not an academic point, because timber revenue from the region's National Forests will determine the payment to counties. We recommend that the EIS provide a table with a range of projected payments to counties with a clearer statement of assumptions of prices in the world market. What looks like a low payment to counties due to decreased timber volume in the current draft, will in fact become a greater increase in payments to counties in the near future due to increasing world prices.

Sincerely,

*Linda J. Ford*  
for Mark Oberle

Mark Oberle  
Board of Directors  
Conservation Committee

cc:  
Ty Ivey, Ocmulgee Audubon Society  
Eugenia Thompson, Oconee Audubon Society  
Larry Thompson, National Audubon Society



Received 3/25/94  
RCW

212

## Southern Environmental Law Center

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Regional Office  
201 West Main Street, Suite 14  
Charlottesville, VA 22901-5004  
(804) 977-4090

March 24, 1994

Mr. Joseph M. Dabney  
RCW EIS Team Leader  
1720 Peachtree Road, NW  
Room 718-N  
Atlanta, Georgia 30367-9102

Re: Draft Environmental Impact Statement for the Management  
of the Red-Cockaded Woodpecker and its Habitat on  
National Forest Lands in the Southern Region

Dear Mr. Dabney:

We submit the enclosed comments on the above-referenced document on behalf of some of the nation's and region's leading conservation organizations. Attached to these comments are analyses of the Forest Service's proposal to recover the red-cockaded woodpecker on the national forests by leading experts in the fields of ornithology, plant ecology, vertebrate ecology, forestry, the longleaf pine ecosystem, and the biology and management of the red-cockaded woodpecker. We believe these comments will assist the forest service in the development of an ecosystem restoration and management approach to the recovery of this endangered species. We look forward to your considered response to our comments and recommendations.

Sincerely,

*Derb S. Carter, Jr.*  
Derb S. Carter, Jr.  
Attorney

DSC/pad

Response to Comments in Letter No. 212

From: Southern Environmental Law Center

Derb Carter, Jr.

Comment No. Response

1. See Letter #100, Response to Comment #6.
2. The strategy and actions contained in the RCW EIS are aimed at recovery of the RCW. To do so, the EIS establishes criteria to delineate habitat management areas (HMA) and population objectives and establishes standards and guidelines for management within the HMA's.
3. Refer to response #2, above.
- 4.-6. Comments noted.
7. The commentor has successfully quoted the text that now appears in the FEIS; however, the same passage continues, stating that providing "a sustained uniform flow of RCW habitat indefinitely requires that each annual age and/or size class of pine trees from Year 1 to recommended rotation age ... be equally represented in the areas managed for RCW. This balance of different stand structures and spatial patterns can provide habitats for a diversity of plants and animals (Oliver 1992)." The focus is on habitats and diversity and not on timber yield where the RCW strategy is concerned.
8. See Letter #29, Response to Comment #1.
9. See Letter #29, Response to Comment #1.
10. Comments noted.
11. Comment noted.
12. The importance of fire throughout the year is recognized in the EIS. The effects of fire on various species is also recognized. A thorough search of the FEIS will show that fire is well-integrated into the strategy for recovery of the RCW.
13. Although pine restoration would be based on soil and site conditions and could be used to restore any desirable pine species, longleaf and shortleaf pines are likely to be the

COMMENTS OF

NATIONAL WILDLIFE FEDERATION  
THE WILDERNESS SOCIETY  
NATIONAL AUDUBON SOCIETY  
ATLANTA AUDUBON SOCIETY  
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GEORGIA CHAPTER OF THE SIERRA CLUB  
FRIENDS OF THE APALACHICOLA NATIONAL FOREST

ON THE

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE MANAGEMENT  
OF THE RED-COCKADED WOODPECKER AND ITS HABITAT ON  
NATIONAL FOREST LANDS IN THE SOUTHERN REGION

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species restored most frequently. All alternatives encourage/allow restoration of the longer lived and more suitable pine types, unless the stand in question is needed to provide foraging or nesting habitat for the RCW in the immediate future. Conversely, conversion of longleaf pine, in areas occupied by RCW, to another pine species will normally not occur, but if necessary would require consultation with the Fish and Wildlife Service.

14. See Letter #19, Response to Comment #1 and Letter #119, Response to Comment #7.

15. See Letter #33, Response to Comment #26.

16. The sub-HMA strategy is desirable because it allows the forest manager to move toward establishing a balanced age/size class distribution which will be beneficial to the RCW in the long-term. A balanced age/size class distribution helps ensure a sustained flow of RCW habitat through time and may make the forest less vulnerable to damage by hurricanes (Hooper and McAdie 1994). The sub-HMA strategy also helps reduce economic impacts, especially in the most heavily impacted rural areas. It is felt this economic concession can be made with no adverse effects to the RCW.

17. Procedures described in the Fish and Wildlife Service Blue Book (USDI Fish and Wildlife Service 1989) will be followed for designating and managing foraging habitat. The actual guidelines to be used are contained in the FEIS.

18. In determining placement of artificial cavities, the EIS identifies active clusters with a single cavity as first priority. Rather than encouraging rapid population expansion, this approach focuses limited resources on areas where there is most likelihood of success. See also, Response #2 to Comment letter #149.

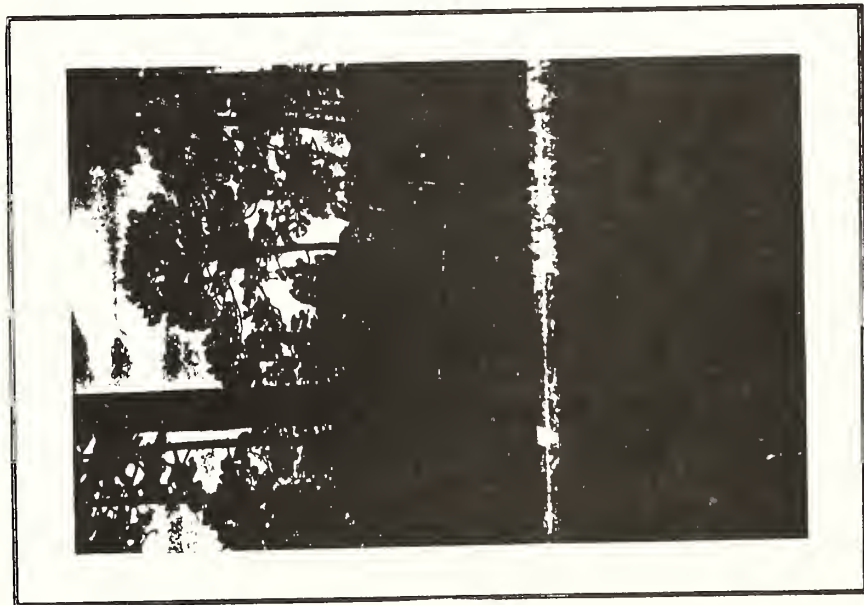
19. The analysis presented in the Draft EIS was enlarged for the Final EIS. In addition, further context for analysis will be found in the Revision efforts for the individual Forest Plans.

20. Comment noted.

Species go extinct one individual at a time. For decades the red-cockaded woodpecker has been losing its grip on existence. A stillness has descended on the pine forests as the chatter of this little bird has ceased to be heard. Colony after colony has winked out forever, leaving empty cavity trees as mute sentinels marking their passage.

Can this woodpecker be saved from extinction? Yes, it can. We know enough about the bird to achieve that goal. We know how to manage a forest to facilitate its recovery. Its ultimate fate depends on the answer to a second question. How can society get the U. S. Forest Service to change its management strategy in order to preserve this woodpecker?

Robert W. McFarlane, A Stillness in the Pines



Old growth (350+ year) and young longleaf pine on the Wade Tract Preserve in southwest Georgia. The surrounding, privately owned forest produces quality timber under uneven-aged management and supports the sixth largest population of red-cockaded woodpeckers.



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## I. INTRODUCTION

In 1988, Judge Parker in Texas held that the Forest Service's management of the Texas national forests was causing the extirpation of the endangered red-cockaded woodpecker in violation of the Endangered Species Act. The following year, Forest Service biologists determined that the majority of the populations of red-cockaded woodpeckers on southern national forests were declining. The Forest Service in March and again in May 1990 issued interim guidelines limiting timber management practices pending the preparation and implementation of final regional guidance. Interim guidelines were applied to all national forests with red-cockaded woodpecker populations except the Texas national forests. Application of the interim guidelines to the Texas national forest required court approval, which the Forest Service sought. Last week, on March 15, 1994, the court denied the Forest Service's request to apply the interim guidelines to the Texas national forests. The court held:

The [Forest Service's] currently-proffered Plan is simply the latest in a (seemingly never-ending) pattern of proffered Plans which again and again reflects the agency's dogmatic adherence to the sorts of timber practices that have pushed the Red-cockaded Woodpecker to the brink of extinction in its native home in the Texas national forests -- and which have unambiguously been found violative of the clear dictates of the Endangered Species Act. Perhaps the [Forest Service's] touted, "coming soon," newest long-term Plan will demonstrate a less deadly devotion for the illegal timber management practices typifying the [Forest Service's] past efforts at Red-cockaded Woodpecker Plan-making. Hope springs eternal.

Sierra Club v. Espy, Civil Action No. L-85-69-CA (March 15, 1994) at 12.

Unfortunately, Judge Parker's hope has not been realized. Although the proposed regional guidance includes some important

steps toward recovery of the endangered woodpecker, the positive aspects of the plan are nearly completely undermined by continued adherence to even-aged timber management, clear-cutting and its variations, and the unwarranted dismissal of viable timber management alternatives. As discussed in the comments below, the Forest Service's stated objective of ecosystem management to recover the red-cockaded woodpecker quickly unravels in the details of the plan. These comments conclude with several recommendations which we respectfully request that the Forest Service implement as final regional guidance to restore the southern pine ecosystem and recover the endangered red-cockaded woodpecker on the national forests.

## II. STATUTORY AND REGULATORY BACKGROUND

### A. The Endangered Species Act.

1. The Forest Service has an affirmative obligation to conserve endangered and threatened species.

All federal agencies have an affirmative obligation to carry out programs that further the purposes of the ESA. Section 7(a)(1) of the ESA provides that

Federal agencies shall, in consultation with and with the assistance of the Secretary [of the Interior], utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species.

16 U.S.C. 1536(a)(1). The term "conservation" is defined in the ESA to include

the use of all methods and procedures which are necessary to bring any endangered or threatened species to the point at which the measures provided pursuant to this act are no longer necessary.

16 U.S.C. 1532(3). The U.S. Supreme Court has determined that

the legislative history undergirding § 7 [of the ESA] reveals an explicit congressional decision to require agencies to afford first priority to the declared national policy of saving endangered species ... [and] a conscious decision by Congress to give endangered species priority over the "primary missions" of federal agencies.

Tennessee Valley Authority v. Hill, 98 S.Ct. 2279 (1978).

2. Forest Service actions must not jeopardize the continued existence of endangered or threatened species or result in the adverse modification of critical habitat.

Section 7(a)(2) of the ESA prohibits all Federal agencies from engaging in any action that is likely to jeopardize the continued existence of a listed species or destroy or adversely modify its critical habitat. Section 7(a)(2) states that

Each federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency ... is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined by the Secretary ... to be critical.

16 U.S.C. 1536(a)(2). In fulfilling the requirements of Section 7(a)(2), "each agency shall use the best scientific and commercial data available." *Id.* Regulations implementing the ESA define "jeopardize the continued existence" as

to engage in any action that reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, number, or distribution of that species.

50 C.F.R. 402.02 (1992). "Destruction or adverse modification of habitat" is defined as

direct or indirect alteration that appreciably diminishes the value of the critical habitat for both the survival and recovery of a listed species. Such alterations include, but are not limited to, alterations adversely

modifying any of those physical features that were the basis for determining the habitat to be critical.

50 C.F.R. 402.02 (1992).

3. Forest Service actions must not significantly degrade habitat or impair behavioral patterns and thereby take an endangered or threatened species.

Section 9 of the ESA prohibits the taking of any endangered or threatened species. 16 U.S.C. 1538(a)(1). The term "take" includes actions which harass or harm endangered or threatened species. Regulations define harass and harm as follows:

Harass in the definition of "take" in the Act means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding or sheltering.

Harm in the definition in the Act means an act which actually kills or injures wildlife. Such an act may include significant habitat degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering.

50 C.F.R. 17.3 (1991). Habitat degradation that could result in extinction of an endangered or threatened species is a sufficient basis for a taking. Palila v. Hawaii Dept. of Land & Natural Resources, 852 F.2d 1106 (9th Cir. 1988).

4. The Secretary of the Interior must designate critical habitat for endangered or threatened species if it is determinable and prudent.

Critical habitat must be designated concurrently with the listing of a threatened or endangered species, unless the critical habitat is not determinable at the time of listing or it is not prudent to designate critical habitat. The ESA makes this clear:

The Secretary, by regulation ... and to the maximum extent prudent and determinable -- shall, concurrently



with making a determination ... that a species is an endangered species or a threatened species, designate any habitat of the species which is then considered to be critical habitat.

16 U.S.C. 1533(a)(3)(A). The Fish and Wildlife Service was held to have abused its discretion for failing to designate critical habitat concurrently with the listing of the northern spotted owl as a threatened species.

The language employed in Section 4(a)(3) and its place in the overall statutory scheme evidence a clear design by Congress that designation of critical habitat coincide with species listing determination. The linkage of these issues ... reflects the studied and deliberate judgment of Congress that the destruction of habitat was the most significant cause of species endangerment.

Northern Spotted Owl v. Lujan, 758 F.Supp. 621 at 624 (W.D.Wash. 1991).

5. Forest Service management of the Texas national forests has violated § 7 and § 9 of the Endangered Species Act.

In Sierra Club v. Lyng, the court held that the Forest Service had violated § 7 of the ESA in that management of the Texas national forests jeopardized the continued existence of the red-cockaded woodpecker. The court found that the Forest Service had

failed to take the "action necessary to insure" that their current management practices does not jeopardize the continued existence of the woodpecker or will not destroy or modify habitat essential for its survival.

694 F.Supp. 1260, 1272 (E.D. Tex. 1988), *aff'd* in part, *rev'd* in part, 926 F.2d 429 (5th Cir. 1991). The court further held that the management practices employed by the Forest Service on the Texas national forests had resulted in a taking of the red-cockaded woodpecker. The court found that the Forest Service management practices "when taken as a whole, detrimentally impact upon the

woodpecker and are largely responsible for the rapid decline of the remaining birds in Texas."

694 F.Supp. at 1272. The court held that "[c]learcutting within 1,200 meters of active colonies must be eliminated and replaced with selection management." 694 F. Supp. at 1268. The court issued an injunction enjoining the Forest Service from engaging in even-aged management within 1200 meters of identified active and inactive red-cockaded woodpecker colony sites.<sup>1</sup>

The court also ordered the Forest Service to submit a proposed comprehensive red-cockaded woodpecker management plan for the Texas National Forests for judicial review and approval. On March 15, 1994, the court rejected the Forest Service's most recent proposal that the court approve management of the Texas National Forests under the "Interim Standards and Guidelines for Management of Habitat Within 3/4 Mile of Colony Sites" (Alternative A in the DEIS). In rejecting this Forest Service proposal, the court held:

On three separate occasions, this Court has been presented with argument (and purported "evidence") by the [Forest Service] that the Red-cockaded Woodpecker can be saved in the Texas national forests despite continued adhere (sic) by the Forest Service to its historical modus operandi of even-aged timbering in these forests. The Court has repeatedly rejected this assertion. Nonetheless, the defendants have once again presented this argument to the Court -- in the form of their most recent Plan.

...

<sup>1</sup> On appeal, the Court of Appeals upheld the District Court's injunction pending the approval by the District Court of "a proper timber management plan for the national forests of Texas that adequately addresses the effects of [the Forest Service's] contemplated actions on the RCW habitat and its continued survivability." Sierra Club v. Yeutter, 926 F.2d 429, 440 (5th Cir. 1991).

In this case, it was well-documented at trial -- even based on the Forest Service's own scientists' studies -- that the defendants' policies and concomitant forest management practices had resulted in dramatic and dangerous population declines of the Red-cockaded Woodpecker. The evidence was to the effect that, under continued Forest Service practices on the forests for which there was accurate data ... the Red-cockaded Woodpecker would be extinct by the year 1995. The evidence also revealed that the major problems for the endangered woodpecker in the Texas national forests were habitat fragmentation and inadequate management of habitat.

...  
Instead of overcoming its institutional denial, and addressing the habitat fragmentation resulting from its past practices, the Forest Service proposes in its currently-proffered plan to continue a general utilization of even-aged management practices in the Red-cockaded Woodpecker habitat of the Texas national forests.

...  
Simply put, the plaintiffs are right: "[u]nder the banner of enhanced Red-cockaded Woodpecker protections, the Forest Service proposes to reinstate many of the same timbering practices that have previously endangered the Texas populations of the Red-cockaded Woodpecker."

...  
In sum: far from meeting the Forest Service's legal responsibility for taking over the protection of the endangered Red-cockaded Woodpecker in the Texas national forests, the currently-proffered plan actually, unambiguously, threatens to reverse the improvement the endangered Red-cockaded Woodpecker has managed to achieve under the "short-term" protection of the Court's 1988 Orders.

Sierra Club v. Espy, Civil Action No. L-85-69-CA (March 15, 1994) at 4,6,9-11.

(6)  
B. The National Forest Management Act.

The National Forest Management Act (NFMA) and implementing regulations require the Forest Service to provide for and maintain the ecological integrity of our national forests. The requirement in the NFMA to provide for diversity in the national forests reflects the congressional mandate to bring timber production into

balance with wildlife and ecological values. The NFMA directs the Forest Service to:

provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives.

16 U.S.C. 1604(g)(3)(B). As Senator Hubert Humphrey, a primary drafter of the diversity provision of the NFMA, stated:

The days have ended when the forest may be viewed only as trees and trees viewed only as timber. The soil and the water, the grasses and the shrubs, the fish and the wildlife, and the beauty that is the forest must become integral parts of resource managers' thinking and actions.

Senate NFMA Hearings at 260.

One of the principles that must guide planning and management is the

"[r]ecognition that the National Forests are ecosystems and their management for goods and services requires an awareness and consideration of the interrelationships among plants, animals, soil, water, air, and other environmental factors within such ecosystems."

36 C.F.R. 219.1(b)(3). NFMA regulations specify that "fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area." 36 C.F.R. 219.19. A viable population is defined as "one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area." *Id.* 219.19.

7. C. The National Environmental Policy Act.

The National Environmental Policy Act (NEPA) requires the preparation of an environmental impact statement (EIS) for major federal actions which significantly affect the environment. 42



U.S.C. 4332(2)(C). An EIS serves two essential purposes: (1) to require federal agencies to thoroughly investigate, evaluate, and disclose environmental consequences associated with any federal action in sufficient detail to assist them in determining whether and how to proceed with a proposed action; and (2) to provide the public with full disclosure on the likely environmental effects of a proposed action. In accordance with these objectives, NEPA requires an agency to take a hard look at all reasonable alternatives to a proposed action, and to "rigorously explore" and "objectively evaluate" the environmental impacts of each alternative. 40 C.F.R. s 1502.14(a).

### III. ECOSYSTEM RESTORATION AND MANAGEMENT

The Forest Service in 1992 announced its commitment "to using an ecological approach in the future management of the National Forests" under a "new policy of ecosystem management."<sup>2</sup> The Forest Service proposes to utilize ecosystem management to meet its obligations to protect and recover the red-cockaded woodpecker on the national forests in the Southern Region. "The proposed new Regional direction would apply an ecosystem management approach, at the landscape level, focusing on restoration of the habitat conditions under which the RCW evolved." DEIS at ix.

- 7
- A. Ecosystem management must restore and maintain the integrity of the forest as an ecosystem.

A task force of the Society of American Foresters recently

<sup>2</sup> Memorandum of June 4, 1992 from F. Dale Robertson, Chief, Forest Service to Regional Foresters and Station Directors.

concluded that a shift to ecosystem management is required in order to maintain long-term forest health and productivity. The task force specifically distinguished ecosystem management from sustained yield management:

The concepts of traditional sustained-yield management and ecosystem management are different. Traditional sustained-yield management focuses on continuing the flow of one or more products within constraints imposed by environmental and economic factors. Ecosystem management focuses on the condition of the forest, with goals of maintaining soil productivity, gene conservation, biodiversity, landscape patterns, and the array of ecological processes. .... Ecosystem management ... recognizes that natural disturbance regimes and ecosystem processes provide the basic blueprint for sustaining pattern and process across the landscape.

Although the Forest Service professes to base its proposed guidance for recovery of the red-cockaded woodpecker on ecosystem management, the proposal is based largely on traditional sustained-yield management utilizing modified - but basically industrial-forestry practices. The DEIS states

A goal of forest management and the objective of forest regulation is to render a forest the source of an indefinitely sustained and uniform flow of benefits and services. Regulation is obtained at the forest (landscape level) and not at the stand level. The forest, not the stand, is the unit from which a sustained annual yield of products and benefits is provided.

DEIS at 55. Rather than focus on the ecosystem management objective of "restoration of the habitat conditions under which the RCW evolved," the Forest Service characterizes the management objective as providing "a sustained flow (yield) of RCW habitat." DEIS at 55.

<sup>3</sup> Society of American Foresters, Task Force Report on Sustaining Long-term Forest Health and Productivity (1993) at xv.

- 8 B. Ecosystem management of the southern pine forests must be based on restoring and maintaining natural disturbance regimes and ecosystem processes.

As stated previously in the excerpt from the task force report of the Society of American Foresters, natural disturbance regimes and ecosystem processes provide the "basic blueprint" for ecosystem management. This goal of ecosystem management is incorporated in the Forest Services stated objective to restore "the habitat conditions under which the RCW evolved." DEIS at ix. Management practices must be based on an understanding of the natural disturbance regimes and ecosystem processes of the pine forests in which the woodpecker evolved.

1. The longleaf pine ecosystem is a fire-maintained forest characterized by the development of old growth trees in an all age forest and a diverse herbaceous groundcover.

Longleaf pine forests were the primary habitat for the red-cockaded woodpecker. The longleaf pine forest is one of the most endangered natural communities in the United States. Approximately 3.8 million acres, or less than 5%, of the original acreage remains. Of this total, less than 5000 acres of old growth longleaf pine forest remains in small tracts across the Southeast.

Dr. Sharon Hermann, Plant Ecologist at Tall Timbers Research, Inc., has conducted extensive research on the ecology and management of the longleaf pine ecosystem. She directs management and research activities on the Wade Tract Preserve, one of the few remaining tracts of old-growth longleaf pine forest. In the attached statement, Dr. Hermann characterizes the ecology,

structure, and natural regeneration of longleaf pine forests. She states that historical accounts and ecological observations

suggest regeneration in a natural setting occurred in a forest that was spatially complex. The forest was one that had scattered reproductive sized adults with appropriate regeneration sites (open areas) relatively close by. This pattern produces a multi-age (-size) class forest. ... The spatial pattern of longleaf pine forest described above, explains why single tree selection (or very small group selection) for saw timber and poles, has been promoted as the ecologically appropriate method of forestry for this habitat type.

Responding to the Forest Service's contention that large scale even-aged management is ecologically appropriate timber management due to the historical occurrence of large blowdowns, Dr. Hermann states that, while blowdowns undoubtedly did and do occur, these are rare occurrences. "So rare, in fact, that there are no species that exhibit adaptations to this condition. Conversely, there are dozens of species documented to display characteristics that are keyed to living in an open, frequently burned forest."<sup>5</sup>

Dr. Hermann identified "numerous inconsistencies" in the DEIS and found "a basic misunderstanding of fundamental ecology of the longleaf pine forests."

This means that management recommendations based on this faulty information are also flawed. ... I contend that, when the DEIS section on vegetation is amended to accurately reflect current understanding of old-growth longleaf pine forests, some forestry possibilities that are ecologically unsound will be eliminated and many inconsistencies in the plan can be corrected. ... Timber harvest and RCW management are not automatically incompatible. However, forestry must listen to lessons revealed through study of the natural history of dominant or key species. Longleaf pine forests should not be

<sup>4</sup> Statement of Dr. Sharon Hermann at 3.

<sup>5</sup> Id. at 4.



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farmed on a long rotation but rather selectively harvested on a schedule determined by the habitat.

The report of the Scientific Summit on the Red-cockaded Woodpecker concluded that "[i]n ecosystems inhabited by the red-cockaded woodpecker, historical conditions are characterized by the development of old growth trees in an all age forest with even aged patches, where the even aged patches vary in size." RCW Scientific Summit reprinted in DEIS at 437. Under ecosystem management, timber management systems should be based on this basic blueprint of disturbance regimes and ecological processes. Uneven-aged management (single tree and small group selection) is the timber management system which most replicates natural disturbance regimes and results in the development of the pine forest habitat conditions under which the red-cockaded woodpecker evolved.

2. Other pine forest types should be managed based on natural disturbance regimes and ecosystem processes

The above discussion addresses specifically management of the longleaf pine ecosystem, the most important habitat type for the red-cockaded woodpecker. Other pine forest types (shortleaf, pond, loblolly, slash, sand, pitch, and Virginia) should be managed under the same basic ecosystem approach of restoring and maintaining natural disturbance regimes and ecosystem processes.

#### IV. PROPOSED MANAGEMENT OF THE RED-COCKADED WOODPECKER AND ITS HABITAT

The Forest Service proposes to provide new regional guidance for the management of the red-cockaded woodpecker on the southern

national forests. Individual Forest Management Plans would be revised or amended to incorporate the new regional guidance. Proposed regional guidance (alternative E in the DEIS) includes the following principal actions:

- > Establish criteria to delineate habitat management areas on each national forest which currently support red-cockaded woodpecker populations and determine population objectives for each of these national forests.
- > Implement a "variable assist" approach to recovery of the red-cockaded woodpecker. Allowable timber management practices would vary depending on the "intensity" of habitat protection. Intensity of habitat protection would depend on the status of the red-cockaded woodpecker population and risk of extirpation.
  - > Permit a wide range of regeneration methods. Establish rotation lengths ranging from 70 to 120 years depending on pine species and limit the regeneration of the oldest one-third of the pine until they are within 10-20 years of rotation age.
  - > Establish criteria to assure adequate foraging habitat.
  - > Emphasize the use of prescribed fire and encourage the restoration of longleaf and other desirable pine species where they occurred historically.
  - > Emphasize the use of artificial cavities and translocation from area to area.
  - > Implement a monitoring program.

10 A. The red-cockaded woodpecker is declining rangewide and on national forest lands.

The red-cockaded woodpecker declined by at least 23% rangewide from the early 1980s to 1990.<sup>7</sup> Approximately 4000 active clusters existed in 1990 with approximately half of these located on national forests. Twelve of the fifteen red-cockaded woodpecker populations targeted for recovery in the Recovery Plan are entirely or in part dependent on national forest lands.

With a few exceptions, the management of the southern pine ecosystem in both public and private lands between the early 1980's and 1990 was not conducted so that red-cockaded woodpeckers could maintain their numbers. Even in populations designated as recovery populations by the U.S. Fish and Wildlife Service, there were more than 300 fewer active sites in 1990 than in the early 1980's. The population in the Red Hills of southwestern Georgia, which is in private land and is managed by long rotation and selective cutting of trees, had by far the most ecologically sound management regime.<sup>8</sup>

A survey of red-cockaded woodpecker populations on national forests in 1988 revealed that 67% of the populations were declining.<sup>9</sup> In March 1989, the Forest Service imposed emergency measures to protect existing red-cockaded woodpecker clusters from

<sup>7</sup> James, F.C., The Status of the Red-cockaded Woodpecker in 1990 and the Prospect for Recovery (in press).

<sup>8</sup> Id. at 2.

<sup>9</sup> Costa, R. and R.E.F. Escano. 1989. Red-cockaded woodpecker status and management in the Southern National Forests. USDA Forest Service, Technical Publication R8-Tp 12.

harmful timber management practices.<sup>10</sup> In May 1990, the Forest Service issued interim guidelines which require that 25 to 40 square feet of pine basal area be retained after any regeneration cutting in a defined zone around all active and inactive red-cockaded woodpecker clusters.<sup>11</sup> Despite these emergency measures, recent Forest Service surveys showed 11 of the 26 populations on the national forests continue to decline. DEIS at 198.

Table 1 summarizes the status of red-cockaded woodpecker populations on the southern national forests based on 1992 survey data. Only one of the 26 populations on national forests is of adequate size to assure long-term viability.<sup>12</sup> Only eight of the 26 populations are of adequate size to assure even short-term viability. Of the twelve national forest populations targeted for recovery by the recovery plan, only six are of adequate size to assure even short-term viability. Clearly the recovery of this endangered species will require immediate and concerted efforts and major changes in the management of the national forests and other public lands.

The Forest Service identifies four primary causes for declines in red-cockaded woodpecker populations on the national forests:

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<sup>10</sup> USDA Forest Service, Policy on Cutting Within 3/4 Mile of RCW Colonies on Existing Timber Sales (March 27, 1989).

<sup>11</sup> USDA Forest Service, Interim Standards and Guidelines for the Protection and Management of the Red-cockaded Woodpecker (RCW) Habitat Within 3/4 Mile of Colony Sites.

<sup>12</sup> This population on the Apalachicola Ranger District of the Apalachicola National Forest has 503 active clusters which is marginally over the 500 active clusters required to assure long-term viability.



1. Lack of midstory vegetation control.
2. Shortage of cavity trees.
3. Habitat loss and fragmentation.
4. Demographic isolation.

DEIS at 12-13. All of these causes of population decline relate directly to timber management practices on the national forests.

B. The Forest Service proposes actions consistent with ecosystem restoration and management and recovery of the red-cockaded woodpecker.

Proposed Forest Service guidance includes actions which, if implemented, will provide a basis for ecosystem management and recovery of the red-cockaded woodpecker.

1. The designation of habitat management areas within the national forests provides a foundation for ecosystem management.

The first recommendation of the 1990 Scientific Summit on the red-cockaded woodpecker is that the Forest Service and other land management agencies "[b]egin managing the RCW on an areawide basis rather than the current system of managing areas contiguous to colony sites."<sup>13</sup> The Forest Service proposes that each national forest delineate and designate "habitat management areas" based on active and inactive red-cockaded woodpecker clusters and potentially suitable habitat. These habitat management areas, once designated, would establish areas dedicated to a "long term commitment to RCW management with relatively inflexible boundaries" DEIS at 41 and 362.

The Forest Service has identified tentative habitat management areas for all national forests which currently have red-cockaded

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<sup>13</sup> Scientific Summit on the Red-cockaded Woodpecker (1990) reprinted in the DEIS 419 at 421.

woodpecker populations.<sup>14</sup> The total acreage within the tentative habitat management areas for these national forests is 1.95 million acres. The total area of pine and pine-hardwood within 3/4 mile radius circles around all existing active and inactive RCW clusters on these national forests is 1.45 million acres. DEIS at 73. Thus, approximately 75% of the area within the tentative habitat management areas is comprised of forest surrounding and within 3/4 mile of existing red-cockaded woodpecker clusters.<sup>15</sup> The designation of habitat management areas dedicated to long-term management of the red-cockaded woodpecker (and the hundreds of other species dependent on the same natural system) provides an essential foundation for ecosystem management.

2. Population objectives for recovery of red-cockaded woodpecker populations, although erroneously calculated, will, if achieved and maintained, assure viability of red-cockaded woodpecker populations.

The Red-cockaded Woodpecker Recovery Plan requires a population size of 250 groups before a population can be considered recovered. The Forest Service states that the U.S. Fish and Wildlife Service has recommended that a population of 400 potential breeding groups is required to achieve a reproducing population of 250. DEIS at 367. In addition, since research has shown that up to 25% of the groups in a population could be single males, 500 active clusters are needed to achieve a reproducing population of

<sup>14</sup> See DEIS Appendix D.

<sup>15</sup> These areas are subject to management under the interim standards and guidelines for red-cockaded woodpecker management on the southern national forests currently in effect.

250. Thus the Forest Service proposes that long-term viability and "recovery" will be achieved when a population reaches 500 active clusters.

Dr. Jeffrey Walters, Department of Zoology, North Carolina State University, has directed the most extensive study of red-cockaded woodpecker population demography to date in the Sandhills region of North Carolina. Dr. Walters states:

The Forest Service is in error in indicating that 250 groups fledgling young represents a viable population (DEIS p. 367). The requirement is an effective population size of 250 groups. In the document it is claimed that this standard is derived from the Summit, but in fact at the Summit the goal identified was not 250 groups fledgling young, but an effective population size of 250 groups (DEIS p. 428). The number of groups fledgling young and the effective population size are not the same thing.

Fortunately, this error does not compromise the further standards of 400 groups or 500 active clusters, because they were developed in reference to effective size. Our paper recently published in Conservation Biology indicates that the required population size for an effective size of 250 groups will be 310-390 potentially breeding groups, depending on the population. Given that it is nearly impossible to collect all the data necessary to determine exactly where within that range a given population belongs, the best strategy is to use a conservative standard. A standard of 400, which is just above the required range and thus always above the minimum, is excellent. ... The end result is that the error does no damage to the management strategy.

Although the Forest Service erroneously arrived at the conclusion, 500 active red-cockaded woodpecker clusters will assure long-term viability of a population. On several national forests, the Forest Service has established population goals which exceed 500 active clusters. These goals are appropriate to provide those populations

with a buffer against natural and other events which could reduce a part of the population.

3. The increased use of prescribed fire is essential to the restoration and maintenance of the longleaf pine ecosystem.

Fire is a natural, and essential, component of the pine forest ecosystem in which the red-cockaded woodpecker evolved. All of the attached expert statements -- from a plant ecologist, forester, ornithologists, and red-cockaded woodpecker biologists -- cite the essential nature of fire in the longleaf pine ecosystem. "The alteration of natural fire disturbance regimes has affected plant communities as evidenced by more than 100 [proposed, endangered, threatened or sensitive] species occurring in RCW habitat that should benefit from prescribed burning." DEIS at 412. The Forest Service proposes to annually prescribe-burn approximately 490,000 acres within habitat management areas throughout the Southern Region. DEIS at 179. Dr. Frances C. James, Department of Biological Sciences, Florida State University, recommends that to improve and maintain red-cockaded woodpecker habitat,

[t]he burning objective should be to burn the entire 2 million acre area of the HMAS every three years (one-third of it every year). The preferred alternative calls for 490,000 acres to be burned per year, not 666,000 acres. The burning program needs to have a much higher priority in most of the 11 forests than it has in the past.

Dr. Phillip D. Doerr, Fisheries and Wildlife Program, North Carolina State University, notes the benefits of growing season fire in longleaf to other species:

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<sup>17</sup> Statement of Dr. Frances James at 6.



The evolution of the fire maintained longleaf system has been accompanied by the parallel evolution (coevolution?) of an array of flora and fauna that have adapted to, and become dependent on the ecological conditions associated with the system. Examples include wiregrass (*Aristida stricta*), which provides the necessary matrix within which longleaf seedlings may germinate after fire. Wiregrass also provides critical nesting habitat for the pinewoods sparrow (*Aimophila aestivalis*), and northern bobwhite (*Colinus virginianus*). Southern fox squirrels (*Sciurus niger*), the large colorful, polymorphic version of this species is also specially adapted to life in the pine savannahs typical of longleaf (Weigl et al 1989). Wild Turkeys (*Meleagris gallopavo*) and white-tailed deer also maintain fine densities in fire managed longleaf. Refer to harvest data from Fort Bragg, North Carolina for deer and to Camp Lejeune, North Carolina, for data on deer and Wild Turkey.

Among reptiles, the endangered gopher tortoise (*Gopherus polyphemus*) is reported to be endemic to the sandy soils dominated by longleaf in Florida (Franz & Auffenberg 1978). The burrows constructed by the tortoise are important for the survival of several threatened species, including the Florida gopher frog (*Rana areolata*), the indigo snake (*Drymarchon corais*), the pine snake, and the florida mouse (*Peromyscus myscus floridanus*) (Speake 1981). In addition, the endangered pine barrens tree frog (*Hyla andersoni*) inhabits the wet shrub bogs where drainage is retarded, but where frequent growing season fires discourage hardwood encroachment (Means & Moler 1981).

Forest Service guidelines should require growing season prescribed fires throughout the habitat management areas (with the goal of burning each acre at least every three years) to control midstory vegetation and sustain the native ground cover.

4. Restoration of longleaf and other pines where they occurred historically through replacement of offsite species should be systematically pursued.

It is self-evident that restoration of longleaf and other pines on sites where these species occurred historically must be a key objective of ecosystem management. The tens of thousands of acres of "offsite pine species" on the national forests are the

result of the systematic conversion by the Forest Service of natural longleaf and other pine forests to slash and loblolly pine plantations. These past Forest Service practices not only fragmented habitat but replaced longleaf pine with pine species less preferred by the red-cockaded woodpecker.

The Forest Service proposes "pine restoration," the conversion of offsite pine species to longleaf and other desirable pine species, as a part of the red-cockaded woodpecker recovery strategy. The proposed regeneration method for pine restoration is clearcutting. While the Forest Service should pursue the restoration of longleaf and other desirable pine species, it is important that these restoration efforts not become a justification for continuation of excessive and abusive clearcutting practices.

C. Other proposed actions are inconsistent with ecosystem restoration and management and recovery of the red-cockaded woodpecker.

The Forest Service proposes other actions which are inconsistent with ecosystem management and the recovery of the red-cockaded woodpecker.

1. The continued emphasis on even-aged management systems and the unwarranted dismissal of uneven-aged management for longleaf pine is contrary to the stated objective of ecosystem management.

The Forest Service acknowledges that the "fire dependent pine forests in which the red-cockaded woodpecker evolved were indeed uneven aged forests." DEIS at 33. The Service then departs entirely from its commitment to ecosystem management to "restore the habitat conditions under which the red-cockaded woodpecker

evolved" with a continued emphasis on even-aged management, clearcutting and its variants, in the proposed guidelines.

- a. Even-aged management fragments the forest and does not restore the habitat conditions under which the red-cockaded woodpecker evolved.

The Forest Service proposal allows clearcutting within habitat management areas established for the red-cockaded woodpecker (1) for populations at management intensity level 1; (2) for the regeneration of offsite pine species; (3) for regeneration of virginia and pitch pine stands; (4) for the regeneration of understocked or damaged stands. The Forest Service proposal allows seed tree, shelterwood and irregular shelterwood (two-stage clearcutting) for within habitat management areas (1) for populations at management intensity level 2 and (2) for populations at management intensity levels 3 and 4 for areas within the HMA but outside designated sub-HMAs. The Forest Service proposal allows even-aged management through irregular shelterwood (retaining 6-10 trees per acre) for populations at any management intensity level.

- b. Uneven-aged management of longleaf pine is a biologically sustainable and economically viable management system.

Although the proposed management direction allows uneven-aged management, the Forest Service strongly, and erroneously, implies that uneven-aged management is not a viable management system. Moreover, given existing timber management practices, it is improbable that individual national forests will employ uneven-aged management to any significant degree unless directed to do so.

The Forest Service acknowledges that "the pre-Colombian fire dependent pine forests that are home to the RCW were indeed

uneven-aged forest." DEIS at 33. The Service then proceeds to turn ecology, and ecosystem management, on its head by suggesting that single tree selection "is not appropriate to regenerate longleaf pine;"<sup>18</sup> that the "intensity of burning necessary to maintain quality RCW habitat is not compatible, in some cases, with uneven-aged management strategies, because the young pine trees needed to replace the older trees are killed by the fire;"<sup>19</sup> and even providing a "Longleaf Pine Exception" to the requirement that trees be retained after irregular shelter wood cuts at red-cockaded woodpecker management intensity levels 3 and 4.<sup>20</sup>

Mr. Stephen T. Lindeman is a professional forester with work experience in Florida, Georgia, and North and South Carolina. Mr. Lindeman worked for Georgia-Pacific Corporation in a variety of positions. He is currently enrolled at Duke University and expects to receive a Master of Forestry and a Master of Environmental Management degree in May 1994. Mr. Lindeman's research has focused on ecological forest management for longleaf pine-wiregrass communities, primarily in the Red Hills region of Georgia and Florida. Mr. Lindeman distinguishes ecological forest management from the industrial forestry model:

Ecological forest management is designed to maintain multiple resources on a forested area, both the commodity resources used by man and the ecological resources necessary to perpetuate the forested ecosystem. For the Red Hills region, these resources include timber for income, game and non-game wildlife, and the conservation

<sup>18</sup>

DEIS at 66.

<sup>19</sup>

DEIS at 34.

<sup>20</sup>

DEIS at 188.



of threatened and endangered species, all occurring in open pine woods maintained through the ecologically correct use of controlled burning. Ecological forestry, utilizing some form of uneven-aged management, is being proposed as an alternative to the industry forestry model of clearcutting, followed by intensive site preparation and artificial regeneration. This shift is prompted by the growing belief that the conservation of biological diversity is not being furthered by the traditional forestry methods in widespread use on industrial and non-industrial private timberlands.

A key objective of Mr. Lindeman's research is to determine whether ecological forest management, uneven-aged management of the longleaf pine-wiregrass community, is both biologically sustainable and economically viable. Mr. Lindeman concludes:

My research analyzes and evaluates three distinct approaches to uneven-aged management in the Red Hills -- the Stoddard-Neel Approach to forest management; the Farrar BD-q selection system for longleaf pine; and the Dynamic Modeling approach. ... Based on my review and evaluation of these three approaches, ecological forest management is both biologically sustainable and economically viable.

It is noteworthy that Mr. Lindeman's economic analysis does not even include the non-market benefits derived from the forest, including conservation, aesthetics and other values.

Dr. Todd Engstrom, an ornithologist with Tall Timbers Research, has conducted extensive research on the red-cockaded woodpecker in the Red Hills region. Dr. Engstrom states:

Every criticism of uneven-aged silviculture ... can be disputed with examples from the Red Hills. The criticism that the structure of an uneven-aged forest would be detrimental to the RCW is not true. This indicates a lack of understanding of the spatial arrangement of regeneration in an uneven-aged system. Natural regeneration in an uneven-aged system is patchy as gaps are created and filled. The characterization of an uneven-aged forest in which young trees grow in close proximity to RCW trees doesn't take scale and patchiness into account. The system that was strongly advocated throughout the EIS, the irregular shelterwood, seems to

create precisely the structural problems that are incorrectly attributed to uneven-aged silviculture.

Uneven-aged management is very flexible and can easily produce excellent foraging habitat and cavity trees for the RCWs in longleaf pine forest. Management of some private quail hunting plantations in the Red Hills region of south Georgia and north Florida provides an example of how uneven-aged silviculture can be used as the foundation for ecosystem management. A recent inventory (Engstrom and Baker 1993. Third RCW Symposium) indicates that the Red Hills population is the sixth largest population anywhere. Single-tree silviculture is the dominant method used in the region.

In sum, uneven-aged management is a biologically sustainable and economically viable management system for the longleaf pine forest. It is clearly the timber management system which comes closest to meeting the stated objective of restoring the habitat conditions under which the red-cockaded woodpecker evolved.

2. The designation of "sub-habitat management areas" undermines both the essential foundation for ecosystem management and recovery of the red-cockaded woodpecker.

Proposed regional guidance allows national forests which currently have small red-cockaded woodpecker populations within large habitat management areas to designate "sub-habitat management areas." DEIS at 167. Only the area within the sub-habitat management area would be subject to the intensive management required to stabilize and recover a red-cockaded woodpecker population in severe or extreme risk of extirpation. The Forest Service states that this "sub-habitat management area strategy" is "desirable because it allows the forest manager to move toward establishing a balanced age/size class distribution which will be beneficial to the RCW in the long-term." DEIS at 167.

This strategy is, in fact, a transparent attempt to continue, even within the habitat management areas dedicated to red-cockaded woodpecker management, the industrial forest management practices primarily responsible for the woodpecker's decline. The forest within a habitat management area, but outside a designated sub-area, would be subject to even-aged management including clear-cutting up to 40 acres so long as six trees per acre are retained. DEIS at 166.

3. The proposed guidelines for foraging habitat are inadequate.

The proposed regional guidance would establish criteria to assure adequate foraging habitat for red-cockaded woodpecker clusters. The proposed guidance would require 6350 pine stems greater than 10 inches diameter, 25 years old or older within 1/2 mile and connected to the cluster. Dr. J.H. Carter, III, a noted expert with nearly thirty years of experience in the observation, research and management of the red-cockaded woodpecker, states:

According to the Red-cockaded Woodpecker Recovery Plan and existing U.S. Fish and Wildlife Service guidelines, red-cockaded woodpecker clusters require for foraging habitat at least 8490 square feet of pine basal area with at least 6350 pine stems greater than 10 inches dbh and 30 years old or older, within one-half mile and contiguous to the cluster. I would note at the outset that the Forest Service's proposed foraging guideline falls short of this standard. ... Gone from the proposed foraging guidelines are the requirements that at least 8490 square feet of basal area of pine remain and that the 6350 pine stems be 30 years of age or older. The Forest Service provides no support for this departure from the prevailing guidelines. ... Forest Service foraging guidelines should, at a bare minimum, be consistent with the prevailing U.S. Fish and Wildlife Service guidelines on foraging habitat.

<sup>21</sup> Statement of Dr. J.H. Carter, III at 2-3.

Dr. Carter further states that

an uneven-aged timber management system is clearly the most appropriate timber management practice to address the foraging requirements of the red-cockaded woodpecker. In addition to retaining a proportion of older growth trees for foraging (and perhaps eventually nesting), uneven-aged management avoids the fragmentation of foraging habitat which results from even-aged management. ... The Forest Service proposes to allow several variations of even-aged management within habitat management areas dedicated to red-cockaded woodpecker recovery depending primarily on the status of the woodpecker population. Under these timber management practices, at best 6-10 trees per acre might ultimately be retained in cuts up to 25-40 acres. These practices, while marginally preferable to outright clearcuts, would still excessively fragment the forest, adversely affecting foraging habitat, and setting back prospects to expand red-cockaded woodpecker populations on the national forests. Id. at 3.

4. The proposal does not contain an effective strategy for the use of artificial cavities to stabilize and expand red-cockaded woodpecker populations.

Recent research and application has demonstrated that red-cockaded woodpeckers will utilize artificial cavities. Installation of artificial cavities can be a valuable management tool to stabilize and expand red-cockaded woodpecker populations. The Forest Service proposal prioritizes the circumstances in which artificial cavities will be utilized. The following priorities will be used:<sup>22</sup>

- (1) Active clusters with a single cavity tree.
- (2) When needed to support translocation efforts.
- (3) Active clusters with fewer than four usable cavities.
- (4) Inactive clusters with fewer than four usable cavities within one mile of an active cluster.
- (5) Recruitment stands within one mile of an active cluster.
- (6) Inactive clusters with fewer than four usable cavities within three miles of an active cluster.

<sup>22</sup> DEIS at 176.



- (7) Recruitment stand within three miles of an active cluster.
- (8) Inactive clusters or recruitment stands more than three miles from an active cluster.

Dr. Walters and Dr. James state that the proposed priorities for creation of artificial cavities should be revised.<sup>23</sup> The first priority should be creation of artificial cavities in recruitment stands or other sites with adequate habitat, but without cavities. This would facilitate a more rapid population expansion.

#### V. INADEQUATE ANALYSIS AND DISCLOSURE IN THE DEIS

A principal purpose for the preparation of an environmental impact statement is to fully analyze issues related to a proposed action and to fully disclose environmental effects so the decision can be based on a full understanding of alternative courses of action. The DEIS failed to fully analyze certain key issues and to fully disclose the environmental effects of certain proposed actions. These deficiencies are identified and discussed both in these comments and in the attached expert statements. We have identified certain key deficiencies in analysis and disclosure, which the Forest Service must address. This list is not intended to be exclusive but is intended to highlight those areas we believe need the greatest attention prior to the publication of a final EIS.

- (1) A more thorough analysis and description of the basic ecology of the southern pine forest, particularly the

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<sup>23</sup> See statements of Dr. Jeffrey Walters and Dr. Frances James.

longleaf pine-wiregrass community, is essential as a foundation for proposed ecosystem management.

- (2) More detailed analysis of uneven-aged management as a biologically sustainable and viable timber management option to even-aged management is required.
- (3) The Forest Service should re-evaluate the rationale for elimination of the Texas comprehensive court-ordered management plan.
- (4) A more thorough disclosure of the adverse effects of clear-cutting and other even-aged management systems is required.
- (5) The establishment of areas of pine forest removed from the timber base as ecosystem reference areas on the Southern National Forest should be analyzed.
- (6) The need for clear and specific regional guidance on allowable timber management practices to assure implementation of an effective management strategy on each national forest must be assessed.

#### VI. CONCLUSION AND RECOMMENDATIONS

The Forest Service must manage the southern national forests in a manner which provides for the recovery of the red-cockaded woodpecker. Twelve of the fifteen identified red-cockaded woodpecker populations targeted for recovery are located entirely or in part on national forest lands. Rather than assisting in the recovery of the red-cockaded woodpecker, the management of national forest lands has contributed to the range-wide decline of this endangered species.

The Forest Service proposes to meet its legal obligations to protect and recover the red-cockaded woodpecker through the application of an "ecosystem management approach" which focuses on "restoration of the habitat conditions under which the RCW evolved."<sup>24</sup> Some of the actions in the proposed regional guidance are consistent with this objective: (1) the designation of habitat management areas on the national forests to restore forest conditions which can support red-cockaded woodpecker populations; (2) the establishment of population objectives which, if achieved, will assure short or long-term viability; (3) the increased use of prescribed fire; and (4) the restoration of longleaf and other pines where they occurred historically.

This foundation for a truly new direction in ecosystem restoration and management is, unfortunately, nearly completely undermined by the continued emphasis on industrial, even-aged timber management systems and the unwarranted dismissal of uneven-aged management. The Forest Service acknowledges that the longleaf pine ecosystem in which the red-cockaded woodpecker evolved "were indeed uneven-aged forest[s]"<sup>25</sup> and that the "[t]wo factors with the potential to greatly affect population viability [of the RCW] are fragmentation and alteration of natural disturbance regimes."<sup>26</sup> The proposed approach to address the adverse impacts of fragmentation is, essentially, to utilize "two-age silviculture"

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<sup>24</sup> DEIS at ix.

<sup>25</sup> DEIS at 33.

<sup>26</sup> DEIS at 418.

and to require the retention of varying numbers of trees depending on the status and trends of the particular red-cockaded woodpecker population. This approach deviates from the stated objective of restoring the habitat conditions under which the red-cockaded woodpecker, and a host of other species, evolved: a fire-maintained, all age forest with a high component of old trees.

The Forest Service should implement a modified version of Alternative D as the preferred alternative for restoration and management of the pine forest ecosystem and recovery of the red-cockaded woodpecker. This modified alternative D would allow a "sustained production of forest products" through uneven-aged management, thinnings, and restoration of desirable pine species. The key elements of this modified alternative D are summarized below.

> The regional guidelines should require designation of habitat management areas consistent with the proposed criteria. The habitat management areas must be adequate to support the proposed population objectives for each of the national forests. No "sub-habitat management areas" should be designated within the habitat management area for the purpose of allowing sub-optimal management outside these areas.

> Use growing season fires throughout the habitat management areas (with the goal of burning each acre at least every three years) to control midstory vegetation and sustain the native groundcover.

> Manage the forest within the habitat management areas by uneven-aged management (group and single tree selection) to restore

the habitat conditions under which the red-cockaded woodpecker evolved. Use even-aged management within habitat management areas only when necessary to restore longleaf and other desirable pine species. Longleaf pine restoration should be systematically pursued within conservative guidelines to assure the retention of adequate foraging habitat for existing red-cockaded woodpecker clusters which may be affected by the regeneration.

- > Guidelines to maintain adequate foraging habitat should be consistent with the U.S. Fish and Wildlife Service's minimum guidelines for foraging habitat: a red-cockaded woodpecker cluster requires 8,490 square feet of pine basal area and 6,350 pine stems 10 inches or larger dbh and 30 years of age or older, contiguous to and within one-half mile of the cluster.

- > Regional guidelines should require that each national forest designate a large (1,000 to 5,000 acre) tract of pine forest within the designated habitat management area as an ecosystem reference area. These tracts should represent areas of the forest which currently have the highest densities of red-cockaded woodpeckers and the most intact natural pine forest communities. Ecosystem reference areas will be removed from the timber base but managed with growing season burns. The purpose of these areas is to retain a reference to compare the effects of management within the remainder of the habitat management area.

- > The U.S. Fish and Wildlife Service should designate as critical habitat the habitat management areas designated on each national forest. Although the designation of critical habitat is not a responsibility of the Forest Service, the Forest Service must



consult with the Fish and Wildlife Service on implementation of the regional guidance and the designation of critical habitat should be a part of that consultation.

Attachments (not included here) to Comment Letter #212 (Derb S. Carter)

Attachment 1 - Letter - Todd Engstrom

Attachment 2 - Letter - J. H. Carter, III, Ph.D.

Attachment 3 - Letter - Stephen T. Lindeman

Attachment 4 - Letter - Phillip D. Doerr

Attachment 5 - Article - Frances C. James, "Joint ESA/AIBS Review of President Clinton's Plan for the Management of Forests in the Pacific Northwest".

Attachment 6 - Letter - Professor Frances C. James

Attachment 7 - Letter - Sharon M. Hermann, Ph.D.

Attachment 8 - Letter - Professor Jeffrey R. Walters

Attachment 9 - Letter and Resolution

Response to Comments in Letters No. 213 through 254

From: various commenters

A number of letters were received after the close of the comment period on the Draft EIS but had been postmarked before that date. These comments, as with all previous comments, were read and considered both individually and collectively. However, while the FEIS responds to these comments, we have not included individual responses to all of them. The fact that these letters are not displayed in the final EIS in no way indicates a diminished consideration for their input to the process. We merely had to draw the line somewhere for publication of letters. All letters received are available in the project NEPA file.

In reviewing these documents we determined that the comment by comment responses supplied above, with a few exceptions, have essentially responded to all of their concerns.

The following are a number of comments (paraphrased) that were sufficiently unique that we felt they warranted specific responses:

COMMENT: The nature of the Forest Service's policies and/or restrictions regarding oil and gas exploration and extraction in or near the RCW HMA's should be explained better.

RESPONSE: Leasable minerals and how they are affected by the RCW strategy, are discussed in the FEIS in Chapter 3. Effects of the strategy on this resource vary by alternative. Measures that must be taken to allow permittees to exercise their mineral rights are described there including surface occupancy, clearing, access, as well as when the Forest Service might be charged with "taking" rights. Mitigation measures are also discussed.

COMMENT: Commentor suggests that the Service acquire more land for management of the RCW to avoid impacts on private landowners.

RESPONSE: Comment noted. The EIS addresses adjacent private lands in terms of populations of RCW that are affected by our management, however, it does not address acquisition of additional lands for RCW management purposes.

COMMENT: National Forest lands were purchased for growing timber and incidental stream protection. FS is violating this purpose when it manages lands for the RCW.

RESPONSE: The National Forest lands are to be managed to provide for multiple-use purposes. Wildlife is specifically named as one of those uses in the Multiple Use Sustained Yield Act of 1960. The Endangered Species Act of 1973 requires Federal land management agencies to

manage lands to conserve species facing extinction (endangered species).

COMMENT: Terminology in the DEIS is a problem. The terms "Invalid Cluster" and "Destroyed Cluster" are not clear and need to be improved so they can be understood better by readers.

RESPONSE: Both of the terms mentioned by the commenter have been changed to add to clarity as a result of this comment.

Response to Comments in Letters No. 255 through 274

From: various commenters

Another group includes letters that were mailed (post marked) and received after the close of the comment period. While read and considered in the development of the FEIS, these letters will not be reproduced or responded to here.







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